INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

July 1, 2003

TO: Interested Parties / Applicant

RE: Sonoco Flexible Packaging **T 081-7183-00005**

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, Indiana 46204, **within thirty (30) days from the date of this notice**. The filing for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision or other order for which you seek review by permit number, the name of the applicant, location, the date of this notice, and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for consideration at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

FNTVOP.wpd 8/21/02

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
Administrator, Christine Todd Whitman
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNTVOP.wpd 8/21/02

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Sonoco Flexible Packaging
6502 S. U.S. Highway 31
Edinburgh, Indiana 46124

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T081-7183-00005	
Issued by:Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: July 1, 2003 Expiration Date: July 1, 2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary commercial printing operation that produces coated and laminated printed packaging for food products.

Responsible Official:	Jeff Cheak
Source Address:	6502 S. U.S. Highway 31, Edinburgh, IN 46124
Mailing Address:	P.O. Box 188, U.S. 31 North, Edinburgh, IN 46124-0188
General Source Phone Number:	(812) 526-5511, ext. 224
SIC Code:	2671, 2754, 2759
County Location:	Johnson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) boiler, fueled by natural gas, backup fuel is propane, identified as Boiler EU 11 (No. 1), having a heat input capacity of 20.925 MMBtu/hr, exhausting to stack 01, installed in 1997.

(b) One (1) boiler fueled by natural gas, backup fuel is propane, identified as Boiler EU 12 (No. 2), having a heat input capacity of 20.925 MMBtu/hr, exhausting to stack 02, installed in 1998.

(c) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 101 (6RL), installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 11.2 MMBtu/hr, exhausting to stack S11.

(d) One (1) cold cleaner degreasing unit, identified as EU 102, installed in 1987, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack 13.

(e) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 103 (8RL), installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a permanent total enclosure, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 24.0 MMBtu/hr, exhausting to stack 13.

(f) One (1) cold cleaner degreasing unit, identified EU 105, installed in 1995, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack 13.

(g) One (1) 5X extrusion coater/laminator, identified as EU 201, installed in 1987, product being coated is web substrate packaging material, application method used is roll coating, exhausting to stack 21. EU 201 consists of the following units:

(1) One (1) extrusion laminator

(2) One (1) coating/adhesive lamination deck

(3) One (1) coating deck

(4) Two (2) coating station dryers

(h) One (1) Tower 7 coating booth, identified as EU 202, installed in 1970, product being coated is paper, picture mounting, application method used is meyer rod coating, exhausting to stacks 22, 23, 24, 25, and 26.

(i) One (1) 6X extrusion coater/laminator, identified as EU 204, installed in 1996, product being coated is web substrate packaging material, application method used is roll coating, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 24.0 MMBtu/hr exhausting to stack 13. EU 204 consists of the following units:

(1) Two (2) extrusion laminators

(2) Two (2) coating/adhesive lamination stations, identified as No. 1 and No. 2, each utilizing a gravure cylinder application system, each with a permanent total enclosure capture system, each coating a maximum of 43.2 million (MM) square inches per hour

(3) Two (2) coating/adhesive lamination station dryers, each rated at 1.5 MMBtu/hr

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (Cold cleaner degreasing units, EU 102 and EU 105, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether. EU 102 is limited to 12 cycles per day and 350 days per year.) [326 IAC 8-3].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because it is a major source, as defined in 326 IAC 2-7-1(22).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(c) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the

affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52, Subpart P] [326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52, Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an oxidizer or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification

requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance as defined in 40 CFR 68 is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously

submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Part 2 MACT Application Submittal Requirement

C.21 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:

(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;

(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or

(3) The MACT standard or standards for the affected source categories included at the source are promulgated.

(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard, if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
One (1) boiler, fueled by natural gas, backup fuel is propane, identified as Boiler EU 11 (No. 1), having a heat input capacity of 20.925 MMBtu/hr, exhausting to stack 01, installed in 1997.

One (1) boiler fueled by natural gas, backup fuel is propane, identified as Boiler EU 12 (No. 2), having a heat input capacity of 20.925 MMBtu/hr, exhausting to stack 02, installed in 1998.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from Boiler EU 11, having a heating value of 20.925 MMBtu per hour heat input, shall be limited to 0.5 pounds per MMBtu heat input.

(b) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from Boiler EU 12, having a heating value of 20.925 MMBtu per hour heat input, shall be limited to 0.41 pounds per MMBtu heat input.

The above limitations are based on the following equation: $Pt = \frac{1.09}{Q^{0.26}}$

Pt = Pounds of particulate matter emitted per MMBtu heat input (lb/MMBtu)
Q = Total source maximum operating capacity rating in MMBtu/hr heat input

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.2 Record Keeping Requirements, New Source Performance Standards [326 IAC 12] [40 CFR 60.40c]

Pursuant to 40 CFR 60.40c (Subpart Dc), the Permittee shall record and maintain records of the amounts of each fuel combusted during each day, for each boiler, EU 11 and EU 12, as described under 40 CFR 60.48c. The Permittee shall maintain these records for a period of two (2) years.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
One (1) 11-station 6RL rotogravure printing press with adhesive coating/lamination station, identified as EU 101, installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 11.2 MMBtu/hr, exhausting to stack 11.

One (1) 11-station 8RL rotogravure printing press with adhesive coating/lamination station, identified as EU 103, installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a total permanent enclosure, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 24.0 MMBtu/hr, exhausting to stack 13.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Requirements [326 IAC 2-2-3]

(a) Pursuant to SSM 081-12310-00005, issued on November 14, 2000, the total amount of organic solvent delivered to 6RL rotogravure printing press (EU 101) shall not exceed 701.88 tons per consecutive 12-month period, with compliance determined at the end of each month.

(b) Pursuant to CP 41-1704-00005, issued on September 22, 1988, the VOC emissions from the 6RL rotogravure printing press (EU 101) shall be controlled by a thermal oxidizer with an overall control efficiency of 76%. Therefore, this constitutes the best available control technology (BACT) requirement in 326 IAC 2-2-3 (PSD rule: best available control technology (BACT)) which satisfies the requirements of 326 IAC 8-5-5.

(c) Pursuant to CP 081-4414-00005, issued on August 28, 1995,

(1) As revised by this Title V permit, the VOC input to the 8RL rotogravure printing press (EU 103) shall be limited to 1510 tons per consecutive 12-month period, with compliance determined at the end of each month.

(2) The 8RL rotogravure press (EU 103) shall be enclosed in a permanent total enclosure. This enclosure shall meet the following conditions:

(A) Any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each VOC emitting point.

(B) The total area of all natural draft openings (NDO's) shall not exceed 5% of the surface area of the enclosure's four walls, floor, and ceiling.

(C) The average facial velocity (FV) of air through all natural draft openings (NDO's) shall be at least 3,600 m/hr (200 feet per minute). The direction of air through all NDO's shall be into the enclosure.

(D) All VOC emissions must be captured and contained for discharge through the 8RL thermal oxidizer.

(3) All access doors and windows of the 8RL enclosure whose areas were not included in the area of all natural draft openings in the original total enclosure calculation shall be closed during routine operation of the process.

(4) The 8RL thermal oxidizer shall operate at all times the 8RL rotogravure printing press (EU 103) is operated. When operating, the 8RL thermal oxidizer shall maintain a minimum operating temperature of 1,400°F or a temperature determined in the compliance tests to maintain at least ninety-eight percent (98%) destruction of VOC captured. This condition satisfies the requirements of 326 IAC 8-5-5.

These conditions, combined with the PTE of the 8RL degreaser (EU 105), are necessary in order to limit the VOC PTE to less than 40 tons per year. Therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, are not applicable.

D.2.2 Volatile Organic Compound Emission Limitations for Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5,

(a) the destruction efficiency of the 6RL thermal oxidizer shall be a minimum of ninety percent (90%).

(b) the destruction efficiency of the 8RL thermal oxidizer shall be a minimum of ninety percent (90%).

(c) facility 8RL shall maintain an overall control efficiency of sixty-five percent (65%).

D.2.3 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to each rotogravure printing press, 6RL (EU 101) and 8RL (EU 103), described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.2.4 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK]

This source is subject to 326 IAC 20-18-1, 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry). A copy of this rule is attached.

(a) Organic HAP emissions from the rotogravure printing presses, 6RL (EU 101) and 8RL (EU 103), shall be limited to no more than four percent (4%) of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for each month.

(b) Pursuant to 40 CFR 63.825(b)(4), (f)(5), and (f)(7), the Permittee shall demonstrate that the monthly average as-applied organic HAP content of all materials applied is less than 0.04 kg HAP per kg material applied, as determined by the following equation:

$$H_L = \frac{\sum_{i=1}^{p} M_i C_{hi} + \sum_{j=1}^{q} M_j C_{hj}}{\sum_{i=1}^{p} M_i + \sum_{j=1}^{q} M_j}$$

where the symbols of this equation are defined in 40 CFR 63.822(b). The organic HAP emitted from an uncontrolled press is equal to the organic HAP applied on that press.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each rotogravure printing press, 6RL (EU 101) and 8RL (EU 103), and each corresponding control device.

Compliance Determination Requirements

D.2.6 Thermal Oxidizer Compliance [326 IAC 8-1-2(a)]

(a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the 6RL thermal oxidizer to achieve compliance with Conditions D.2.1(b), and D.2.2(a).

(b) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the 8RL thermal oxidizer to achieve compliance with Conditions D.2.1(c), D.2.2(b), and D.2.2(c).

D.2.7 Volatile Organic Compounds (VOC) Testing Requirements [326 IAC 8-1-4(a)(3)]

Pursuant to 326 IAC 8-1-4(a)(3), the Permittee shall use Method 24 to determine compliance with the VOC content and usage limitations described under Conditions D.2.1(a), D.2.1(b), D.2.1(c), D.2.2(a), D.2.2(b), and D.2.2(c).

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) During the period within 30 and 36 months after issuance of this permit, the Permittee shall conduct a performance test to verify VOC control efficiency as per Conditions D2.1(b) and D.2.2(a) for the 6RL rotogravure printing press (EU 101) and the 6RL thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every 2.5 years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

(b) During the period within 30 and 36 months after issuance of this permit, the Permittee shall conduct a performance test to verify VOC control efficiency as per Conditions D.2.1(c), D.2.2(b), and D.2.2(c) for the 8RL rotogravure printing press (EU 103) and the 8RL thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every 2.5 years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.2.9 VOC Emissions

Compliance with Condition D.2.1(a) shall be demonstrated within 30 days of the end of each month based on the total organic solvent usage for the most recent twelve (12) month period.

D.2.10 Testing Requirements [40 CFR 63, Subpart KK] [326 IAC 20-18-1]

The organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied shall be determined pursuant to 40 CFR 63.827(b)(2).

D.2.11 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the 6RL thermal oxidizer for measuring operating temperature. The output of the system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the 6RL thermal oxidizer at or above the three (3) hour average temperature of 1,400°F.

(b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.2.1(b), and D.2.2(a), as approved by IDEM.

(c) On and after the date approved stack test results are available, the Permittee shall operate the 6RL thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.

D.2.12 Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Condition D.2.1(b), as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the 6RL thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in the most recent compliant stack test.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.2.13 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the 8RL thermal Oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three (3) hour average temperature of the 8RL thermal oxidizer is below 1400°F. A three (3) hour average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.2.1(c), as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three (3) hour average temperature of the 8RL thermal oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.14 Parametric Monitoring

(a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Condition D.2.1(c), as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the 8RL thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.15 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1(a), D.2.1(b), D.2.1(c), D.2.2(a), D.2.2(b), and D.2.2(c), D.2.7, D.2.8(a), D.2.8(b), D.2.9, D.2.11(a), D.2.11(b), D.2.11(c), D.2.12(a), D.2.12(b), D.2.13(a), D.2.13(b), D.2.13(c), D.2.14(a), and D.2.14(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1(a), D.2.1(b), D.2.1(c), D.2.2(a), D.2.2(b), and D.2.2(c).

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage, including cleanup solvent VOC for each month.

(4) The weight of VOCs emitted for each compliance period.

(5) The continuous temperature records (on a three (3) hour average basis) for the thermal oxidizer and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(6) Daily records of the duct pressure or fan amperage.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.16 Record Keeping Requirements, Organic HAP Usage [40 CFR 63.829] [326 IAC 20-18-1]

(a) In order to demonstrate compliance with Condition D.2.4, pursuant to 326 IAC 20-18-1, 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry), the Permittee shall maintain the following records on a monthly basis for each product and packaging rotogravure press:

(1) Total weight of all inks, coatings, varnishes, adhesives, primers, solvents, diluents, reducers, thinners, and other materials applied.

(2) Total weight of organic HAP applied.

(b) The Permittee shall maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 63.825.

(c) All records shall be maintained for five years. At a minimum, the most recent two (2) years of data shall be retained on site.

D.2.17 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Conditions D.2.1(a) and D.2.1(c) shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) To comply with Condition D.2.4, the owner or operator shall comply with the reporting requirements specified under 40 CFR 63.830(b)(1) and (3). On June 1, 1998, the

Permittee notified IDEM pursuant to 40 CFR 63.830(b)(1). On June 29, 2001, the Permittee notified IDEM pursuant to 40 CFR 63.830(b)(3).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
One (1) cold cleaning degreaser unit, identified as EU 102, installed in 1987, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack 13.

One (1) cold cleaning degreaser unit, identified EU 105, installed in 1995, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack 13.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 2-2]

Pursuant to CP (41) 1704-00005, issued on September 22, 1988, the operation of the cold cleaning degreaser EU 102 is limited to 12 cycles per day and 350 days per consecutive 12-month period, with compliance determined at the end of each month.

D.3.2 PSD Requirements [326 IAC 2-2]

Pursuant to CP 081-4414-00005, issued on August 28, 1995, and revised by this Title V permit, the VOC PTE of the cold cleaning degreaser EU 105 combined with the VOC input limit for 8RL rotogravure press (EU 103) in Condition D.2.1(c), is necessary in order to limit the VOC PTE to less than 40 tons per year. Therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, are not applicable. Any change or modification that changes the VOC PTE of the 8RL degreaser requires prior OAQ approval.

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980 (EU 102 and EU 105), the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a), the owner or operator of the cold cleaning degreaser EU 105 shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

(B) the solvent is agitated; or

(C) the solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in 326 IAC 8-3-5(b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b), the owner or operator of the cold cleaning facility EU 105 shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.5 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall maintain daily records in accordance with (1) through (2) below. These records shall be complete and sufficient to establish compliance with the usage limits established in Condition D.3.1.

(1) A log of the dates of use; and

(2) A daily log indicating the number of cycles run per day.

(b) To document compliance with Condition D.3.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage established in Condition D.3.2.

(1) The amount and VOC content of solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The total VOC usage for each month.

(3) The weight of VOC emitted for each compliance period.

(c) These records shall be maintained in accordance with Section C - General Record Keeping Requirements.

D.3.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
One (1) 5X extrusion coater/laminator, identified as EU 201, installed in 1987, product being coated is web substrate packaging material, application method used is roll coating, exhausting to stack 21. EU 201 consists of the following units: 1) One (1) extrusion laminator; 2) One (1) coating/adhesive lamination deck; 3) One (1) coating deck; 4) Two (2) coating station dryers.

One (1) 6X extrusion coater/laminator, identified as EU 204, installed in 1996, product being coated is web substrate packaging material, application method used is roll coating, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 24.0 MMBtu/hr exhausting to stack 13. EU 204 consists of the following units: 1) Two (2) extrusion laminators; 2) Two (2) coating/adhesive lamination stations, identified as No. 1 and No. 2, each utilizing a gravure cylinder application system, each with a permanent total enclosure capture system, each coating a maximum of 43.2 million (MM) square inches per hour; 3) Two (2) coating/adhesive lamination station dryers, each rated at 1.5 MMBtu/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 PSD Requirements [326 IAC 2-2]

(a) VOC input to the 6X extrusion coater/laminator (EU 204) shall be limited to 1999 tons per consecutive twelve (12) month period, with compliance determined at the end of each month.

(b) VOC emissions from the 6X extrusion coater/laminator (EU 204) shall be controlled by the 8RL thermal oxidizer with an overall efficiency of 98%. This condition satisfies the requirements of 326 IAC 8-1-2 and 326 IAC 8-2-5.

This limits potential VOC emissions from the 6X extrusion coater/laminator (EU 204) to less than 40 tons per consecutive twelve (12) month period. Therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, are not applicable. Any change or modification that changes the potential VOC emissions of the 6X extrusion coater/laminator (EU 204) requires prior OAQ approval.

D.4.2 Volatile Organic Compound (VOC) Emissions Limitations [326 IAC 8-2-5] [326 IAC 8-1-2]

(a) VOC input to the 5X extrusion coater/laminator (EU 201) shall be less than 25 tons per consecutive 12-month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per year. Compliance with this limit makes 326 IAC 8-2-5 (Paper Coating Operations) not applicable.

(b) Pursuant to 326 IAC 8-2-5(b), the Permittee shall not cause, allow, or permit the discharge into the atmosphere any volatile organic compounds (VOC) in excess of 2.9 pounds VOC per gallon of coating excluding water delivered to the coating applicator from the 6X coating line (EU 204).

The following conditions apply to the 6X coating line (EU 204) and the 8RL thermal oxidizer when non-compliant coatings are being used:

(c) Pursuant to 326 IAC 8-1-2(b), VOC emissions from the 6X coating line (EU 204) shall be limited to less than 4.8 pounds of VOC per gallon of coating solids. This equivalent limit was determined by using the following equation:

$$E = L / (1 - L/D)$$

Where: L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating
D = Density of VOC in coating in pounds per gallon of VOC
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied

A solvent density of 7.36 pounds of VOC per gallon of solvent was used to determine the equivalent emission limit in pounds of VOC per gallon of coating solids as applied for the applicable emission limit contained in 326 IAC 8-2-5.

(d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the 6X coating line (EU 204) and the 8RL thermal oxidizer shall be no less than 98%. The equivalent overall efficiency was calculated by the following equation:

$$O = \frac{V - E}{V} x100$$

Where: V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each extrusion coater/laminator, 5X (EU 201) and 6X (EU 204), and the 6X control device (8RL thermal oxidizer, described in Section D.2).

Compliance Determination Requirements

D.4.4 Volatile Organic Compounds (VOC) Content and Usage

(a) Compliance with the VOC content and usage limitations contained in Conditions D.4.1(a), D.4.2(a), D.4.2(b), D.4.2(c), and D.4.2(d) shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with Conditions D.4.1(a) and D.4.2(a) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent month.

D.4.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the 8RL thermal oxidizer to achieve compliance with Conditions D.4.2(b) and D.4.2(d).

D.4.6 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

During the period within 30 and 36 months after issuance of this permit, the Permittee shall conduct a performance test to verify VOC control efficiency as per Conditions D.4.1(b) and D.4.2(d) for the 6X coating line (EU 204) and the 8RL thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every 2.5 years from

the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.7 Compliance Monitoring Conditions for PSD

To monitor compliance with Condition D.4.1(b), the 6X extrusion coater/laminator (EU 204) has the following applicable compliance monitoring conditions: The controller on the bypass damper in the vent line from the two coating station dryers to the thermal oxidizer will be connected to a strip chart record which will continuously record the positioning of the damper. The date and time will also be recorded on the strip chart. The strip chart recording compared with each job's schedule and coating calculations will confirm the use of the 8RL thermal oxidizer whenever coatings containing VOC are applied.

D.4.8 Compliance Monitoring Conditions

To monitor compliance with Conditions D.4.2(b), D.4.2(c), and D.4.2(d), pursuant to CP 081-5840-00005, issued on January 24, 1997, the 6X extrusion coater/laminator (EU 204) has the following applicable compliance monitoring conditions: The controller on the bypass damper in the vent line from the two coating station dryers to the thermal oxidizer will be connected to a strip chart record which will continuously record the positioning of the damper. The date and time will also be recorded on the strip chart. The strip chart recording compared with each job's schedule and coating calculations will confirm the use of the 8RL thermal oxidizer whenever non-compliant coatings are applied.

D.4.9 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the 8RL thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three (3) hour average temperature of the 8RL thermal oxidizer is below 1400°F. A three (3) hour average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.4.1(b), D.4.2(b), D.4.2(c), and D.4.2(d), as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three (3) hour average temperature of the 8RL thermal oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.4.10 Parametric Monitoring

(d) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Conditions D.4.1(b), D.4.2(b), D.4.2(c), and D.4.2(d), as approved by IDEM.

(e) The duct pressure or fan amperage shall be observed at least once per day when:

(1) coatings containing VOC are being used and the 8RL thermal oxidizer is in operation.

(2) non-compliant coatings are being used and the 8RL thermal oxidizer is in operation.

When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.11 Record Keeping Requirements

(a) To document compliance with Conditions D.4.1(a), D.4.1(b), D.4.4(a), D.4.4(b), D.4.7, D.4.9(a), and D.4.10(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1(a) and D.4.1(b).

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage, including cleanup solvent VOC for each day.

(4) The weight of VOCs emitted for each compliance period.

(5) The continuous temperature records (on a three (3) hour average basis) for the thermal oxidizer when coatings containing VOC are being used and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(6) Daily records of the duct pressure or fan amperage when coatings containing VOC are being used.

(b) To document compliance with Conditions D.4.2(a), D.4.4(a), and D.4.4(b), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.2(a).

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage, including cleanup solvent VOC for each day.

(4) The weight of total VOC used for each compliance period.

(c) To document compliance with Conditions D.4.2(b), D.4.2(c), D.4.2(d), D.4.4(a), D.4.5, D.4.6, D.4.8, D.4.9(a), D.4.9(b), D.4.9(c), D.4.10(a), and D.4.10(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.2(b), D.4.2(c), and D.4.2(d).

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The total VOC usage for each day.

(4) The weight of VOCs emitted for each compliance period.

(5) The continuous temperature records (on a three (3) hour average basis) for the thermal oxidizer when non-compliant coatings are being used and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(6) Daily records of the duct pressure or fan amperage when non-compliant coatings are being used.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.4.1(a) and D.4.2(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.5 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
One (1) Tower 7 coating booth, identified as EU 202, installed in 1970, product being coated is paper, picture mounting, application method used is meyer rod coating, exhausting to stacks 22, 23, 24, 25, and 26.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Paper and Other Web Coating NESHAP [40 CFR 63, Subpart JJJJ]

The Permittee shall submit an initial notification to IDEM, OAQ and U.S. EPA no later than one year prior to the initial compliance date, which is December 5, 2005. The initial notification shall contain all the information required in 40 CFR 63.9 that is appropriate for the facility.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005
Facility: 6RL rotogravure printing press, EU 101
Parameter: Solvent input
Limit: 701.88 tons per consecutive 12-month period

QUARTER/YEAR: _____

Reporting Period	Current Month	Previous 11 Months (Total)	12-Month Period (TOTAL)
	Solvent Input* (tons)	Solvent Input* (tons)	Solvent Input* (tons)
Quarter Month 1			
Quarter Month 2			
Quarter Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005
Facility: 8RL Press (EU 103)
Parameter: VOC Input (tons)
Limit: 1510 tons per consecutive 12-month period VOC input to EU 103

QUARTER/YEAR: _____

Reporting Period	Current Month	Previous 11 Months (Total)	12-Month Period (TOTAL)
	VOC Input* (tons)	VOC Input* (tons)	VOC Input* (tons)
Quarter Month 1			
Quarter Month 2			
Quarter Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

* VOC input for the unit above can be calculated from the equation given below.
VOC input for 8RL Press EU 103 = [(gallons of ink used * density * weight percent VOC) + (gallons of solvent used * solvent density) + (gallons of adhesive used * adhesive density * weight percent VOC)] / 2000

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Usage Report

(Submit Report Quarterly)

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005
Facility: Cold Cleaning Degreaser, EU 102
Parameter: Cycles
Limit: 12 cycles per day, 350 days per consecutive 12-month period

Month: _____ Year: _____

Day	Number of Cycles	Day	Number of Cycles
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		**Number of Days:**	

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005
Facility: 5X extrusion coater/laminator, EU 201
Parameter: VOC input
Limit: Less than 25 tons per consecutive 12-month period

Months: _____ Year: _____

Reporting Period	Current Month	Previous 11 Months (Total)	12-Month Period (TOTAL)
	VOC Input (tons)	VOC Input (tons)	VOC Input (tons)
Quarter Month 1			
Quarter Month 2			
Quarter Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005
Facility: 6X extrusion coater/laminator, EU 204
Parameter: VOC input
Limit: 1999 tons per consecutive 12-month period

Months: _____ Year: _____

Reporting Period	Current Month	Previous 11 Months (Total)	12-Month Period (TOTAL)
	VOC Input (tons)	VOC Input (tons)	VOC Input (tons)
Quarter Month 1			
Quarter Month 2			
Quarter Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked “No deviations occurred this reporting period”.
9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ____

Title/Position: ____

Date: ____

Phone: ____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name: **Sonoco Flexible Packaging**
Source Location: **6502 S. U.S. Highway 31, Edinburgh, IN 46124**
County: **Johnson**
SIC Code: **2671, 2754, 2759**
Operation Permit No.: **T081-7183-00005**
Permit Reviewer: **Chrystal Wagner**

On November 28, 2002, the Office of Air Quality (OAQ) published a notice in the Daily Journal, Franklin, Indiana, stating that Sonoco Flexible Packaging had applied for a Part 70 Operating Permit to operate a commercial printing operation that produces coated and laminated printed packaging for food products. The notice stated that OAQ proposed to issue a permit for this operation and provided information to the public on how to review the proposed permit and supporting documentation. The notice also informed interested parties of a thirty (30) day comment period to provide comments on the issuance of this permit as proposed.

Upon further review, OAQ has made the following revisions to the permit (**bolded** language has been added, ~~struck~~ language has been deleted). If necessary, the Table of Contents has been modified to reflect these changes.

On December 23, 2002, Anthony C. Sullivan, Barnes & Thornburg, on behalf of Sonoco Flexible Packaging, submitted comments on the proposed Part 70 permit.

On April 7, 2003, Anthony C. Sullivan, Barnes & Thornburg, on behalf of Sonoco Flexible Packaging, submitted additional comments after the public comment period in response to changes OAQ made to the proposed Part 70 permit. Comments submitted on April 7, 2003 are grouped below with similar comments submitted during the comment period and are noted with an asterisk (*). The summary of the comments is as follows:

Section A

Comment 1*:
The permit uses the terms “thermal incinerator” and “thermal oxidizer” to refer to the same control equipment. Sonoco requests that the permit consistently refer to the control equipment as a “thermal oxidizer.”

Response to Comment 1*:
OAQ agrees that there should be consist terms used throughout the permit. The 6RL and 8RL control devices will be consistently described as “thermal oxidizers.” These changes are incorporated into the proposed Part 70 permit.

Comment 2:
Condition A.1 - General Information. The name of the responsible official should be changed from Chris Fluder to Jeff Cheak.

Response to Comment 2:
Because the individual being added to the permit as a responsible official meets the definition pursuant to 326 IAC 2-7-21(34), OAQ has changed Condition A.1 as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]
The Permittee owns and operates a stationary commercial printing operation that produces coated and laminated printed packaging for food products.

Responsible Official:	~~Chris Fluder~~ **Jeff Cheak**
Source Address:	6502 S. U.S. Highway 31, Edinburgh, IN 46124
Mailing Address:	P.O. Box 188, U.S. 31 North, Edinburgh, IN 46124-0188
General Source Phone Number:	(812) 526-5511, ext. 224
SIC Code:	2671, 2754, 2759
County Location:	Johnson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Major Source, Section 112 of the Clean Air Act

Comment 3:
Condition A.2(d) and (f) - Emission Units and Pollution Control Equipment Summary. These descriptions should indicate that the cold cleaning units now exhaust to Stack 13, the 8RL oxidizer stack.

Response to Comment 3:
OAQ has made the appropriate changes to the descriptions of the degreasing units under Condition A.2. See Response to Comment 1* regarding the thermal oxidizer description.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) boiler, fueled by natural gas, backup fuel is propane, identified as Boiler EU 11 (No. 1), having a heat input capacity of 20.925 MMBtu/hr, exhausting to stack 01, installed in 1997.

(b) One (1) boiler fueled by natural gas, backup fuel is propane, identified as Boiler EU 12 (No. 2), having a heat input capacity of 20.925 MMBtu/hr, exhausting to stack 02, installed in 1998.

(c) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 101 (6RL), installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal ~~incineration~~ **oxidation** as control which is fueled by natural gas at a heat input rate of 11.2 MMBtu/hr, exhausting to stack S11.

(d) One (1) cold cleaner degreasing unit, identified as EU 102, installed in 1987, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser **and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr** as control**s**, exhausting to stack ~~12~~ **13**.

(e) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 103 (8RL), installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a permanent total enclosure, using thermal ~~incineration~~ **oxidation** as control which is fueled by natural gas at a heat input rate of 24.0 MMBtu/hr, exhausting to stack 13.

(f) One (1) cold cleaner degreasing unit, identified EU 105, installed in 1995, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser **and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr** as control**s**, exhausting to stack ~~15~~ **13**.

(g) One (1) 5X extrusion coater/laminator, identified as EU 201, installed in 1987, product being coated is web substrate packaging material, application method used is roll coating, exhausting to stack 21. EU 201 consists of the following units:

(1) One (1) extrusion laminator

(2) One (1) coating/adhesive lamination deck

(3) One (1) coating deck

(4) Two (2) coating station dryers

(h) One (1) Tower 7 coating booth, identified as EU 202, installed in 1970, product being coated is paper, picture mounting, application method used is meyer rod coating, exhausting to stacks 22, 23, 24, 25, and 26.

(i) One (1) 6X extrusion coater/laminator, identified as EU 204, installed in 1996, product being coated is web substrate packaging material, application method used is roll coating, using thermal ~~incineration~~ **oxidation** as control which is fueled by natural gas at a heat input rate of 24.0 MMBtu/hr exhausting to stack 13. EU 204 consists of the following units:

(1) Two (2) extrusion laminators

(2) Two (2) coating/adhesive lamination stations, identified as No. 1 and No. 2, each utilizing a gravure cylinder application system, each with a permanent total enclosure capture system, each coating a maximum of 43.2 million (MM) square inches per hour

(3) Two (2) coating/adhesive lamination station dryers, each rated at 1.5 MMBtu/hr

Comment 4:
Condition A.3(b) - Specifically Regulated Insignificant Activities. The fugitive dust rule is not a specific regulation. Therefore, the condition related to paved and unpaved roads should not be included in Condition A.3.

Response to Comment 4:
Condition C.5 - Fugitive Dust Emissions includes the requirement not to allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located. This includes fugitive dust from paved and unpaved roads, and parking lots with public access. Therefore, the following change has been made to Condition A.3:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

~~(a)~~ Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (Cold cleaner degreasing units, EU 102 and EU 105, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether. EU 102 is limited to 12 cycles per day and 350 days per year. EU 105 has limited VOC emissions of 0.375 tons (750 pounds) per month.) [326 IAC 8-3].

~~(b) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].~~

Section B

OAQ has made the following changes to Section B. These changes are an update to the new permit model and are not the result of public comments received during a comment period.

Change B-1:

The duty to supplement an application is not an ongoing requirement after the permit is issued; therefore, Condition B.7 - Duty to Supplement and Provide Information has been modified and Condition B.7(a) has been removed.

B.7 Duty to ~~Supplement and~~ Provide Information ~~[326 IAC 2-7-4(b)]~~ [326 IAC 2-7-5(6)(E)] ~~[326 IAC 2-7-6(6)]~~

(a) ~~The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:~~

~~Indiana Department of Environmental Management~~
~~Permits Branch, Office of Air Quality~~
~~100 North Senate Avenue, P.O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(b)~~ The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

~~(c)~~ **(b)** For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

Change B-2:

Condition B.11(b) was revised to clarify that required record keeping needs to be implemented as well as the rest of the plan to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit. Condition B.11(c) has been revised to clarify that OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The requirements to keep records of preventive maintenance in Condition B.11(d) has been moved to Section D. Because the general record keeping requirements (i.e., retained for 5 years) are in Section C, it is not necessary to include them in this condition or in the D condition. At some sources, an OMM Plan is required. Instead of having two separate plans, the OMM Plan may satisfy the PMP requirements. Therefore, Condition B.11(d) has been added to this condition.

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs**, including any required record keeping,** as necessary to ensure that failure to implement a PMP does not cause or contribute to ~~a violation~~ **an exceedance** of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or ~~contributes to any violation~~ **is the primary contributor to an exceedance of any limitation on emissions or potential to emit**. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) ~~Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~ **To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**

Change B-3:
In order to clarify that an amendment or modification will not be required for the addition, operation or removal of a nonroad engine, Condition B.18(d) has been added to Condition B.18 - Permit Amendment or Modification.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

Change B-4:
For clarity, additional rule cites have been added to Condition B.22 - Inspection and Entry.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] **[IC 13-30-3-1]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have** ~~Have~~ access to and copy any records that must be kept under the conditions of this permit;

(c) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect** ~~Inspect~~ any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample** ~~Sample~~ or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize** ~~Utilize~~ any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

Section C

OAQ has made the following changes to Section C. These changes are an update to the new permit model and are not the result of public comments received during a comment period.

Change C-1:
The following change has been made to Condition C.1 - Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour:

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, ~~the allowable~~ particulate matter emissions ~~rate~~ from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), ~~the allowable~~ particulate emissions ~~rate~~ from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

Change C-2:
Condition C.7 - Asbestos Abatement Projects has been revised to clarify that the requirement to have an Indiana Accredited Asbestos inspector is not federally enforceable.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) **Demolition and Renovation**

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

~~(f)~~ **(g)** Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. ~~The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.~~ **The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.**

Change C-3:
Condition C.14 - Risk Management Plan has been revised so that it is more straightforward. This condition has been revised so that it requires the source to comply with the applicable requirements of 40 CFR 68 if a regulated substance is present at a source in more than a threshold quantity.

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68~~.215~~]

If a regulated substance~~, subject to~~ **as defined in** 40 CFR 68~~,~~ is present at a source in more than a threshold quantity, ~~40 CFR 68 is an applicable requirement and the Permittee shall submit:~~ **the source must comply with the applicable requirements of 40 CFR 68.**

~~(a) A compliance schedule for meeting the requirements of 40 CFR 68; or~~

~~(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);~~

~~All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Change C-4:
Failure to take reasonable response steps shall be considered deviation of the permit; therefore, Condition C.15(b)(4) was revised. Language was added to Condition C.15(e) to clarify that the records that need to be kept are those instances when, in accordance with Section D, response steps are taken.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall ~~constitute a violation of~~ **be considered a deviation from** the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B - Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when**, in accordance with Section D,** response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Change C-5:
In order to clarify which documents need to be certified by the responsible official, the following update has been made to Condition C.16:

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The **response action** documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Change C-6:
Condition C.17(a) - Emission Statement has been updated to include the specific rule cite that defines the regulated pollutants being referred to in this condition.

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of ~~other~~ regulated pollutants ~~(~~as defined by 326 IAC 2-7-1**(32**) **("Regulated pollutant which is used only for purposes of Section 19 of this rule")** from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

Change C-7:
It is acceptable for records to be electronically accessible instead of being physically present at a source; therefore, the following update has been made to Condition C.18:

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required **monitoring** data, reports and support information **required by this permit** shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be ~~kept~~ **physically present or electronically accessible** at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

Section D

Comment 5:
Condition D.1.2 - Preventive Maintenance Plan. This condition should be deleted because there are no control devices for the natural gas-fired boilers. Accordingly, a Preventive Maintenance Plan is not an appropriate requirement.

Comment 6:
Condition D.1.3 - Record Keeping Requirements. This condition related to maintaining records for the boilers should be deleted for the following reasons: (1) Natural gas and propane are the only useable fuels. Therefore, there is no reason to certify that those fuels are utilized. (2) No emission limit applies for sulfur dioxide. Therefore, there should be no requirement for sulfur certification record keeping. (3) No record keeping is required to demonstrate compliance with the particulate matter limit. Therefore, no additional records should be kept.

Comment 7:
Condition D.1.5 - Reporting Requirements. For the reasons set out for Comment 6 above, Condition D.1.5 should be deleted.

Comment 8:
For the reasons set forth above, Sonoco requests that the semi-annual natural gas-fired boiler certification be deleted.

Response to Comments 5, 6, 7, and 8:
Particulate matter emission rates are 0.002 pounds per MMBtu for natural gas, and 0.007 pounds per MMBtu for propane. Because the only useable fuels for the two boilers are these clean-burning fuels, OAQ will not require a preventive maintenance plan in Condition D.1.2, or record keeping and reporting to show continuous compliance with Conditions D.1.1(a) and D.1.1(b). Conditions D.1.2, D.1.3, and D.1.5 have been deleted. The natural gas-fired boiler certification has also been deleted. However, record keeping of fuel usage is required pursuant to NSPS 40 CFR 60.40c (Subpart Dc) in Condition D.1.4. This condition remains, and has been renumbered:

~~D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each facility, EU 11 and EU 12.~~

~~D.1.3 Record Keeping Requirements~~

~~(a) To document compliance with Conditions D.1.1(a) and D.1.1(b), the Permittee shall maintain records in accordance with (1) through (5) below.~~

~~(1) Calendar dates covered in the compliance determination period;~~

~~(2) To certify compliance when burning natural gas or propane as backup, the Permittee shall maintain records of fuel used.~~

~~If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:~~

~~(3) Fuel supplier certifications;~~

~~(4) The name of the fuel supplier; and~~

~~(5) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.~~

~~The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.~~

~~(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

D.1.~~4~~ **2** Record Keeping Requirements, New Source Performance Standards [326 IAC 12] [40 CFR 60.40c]

Pursuant to 40 CFR 60.40c (Subpart Dc), the Permittee shall record and maintain records of the amounts of each fuel combusted during each day, for each boiler, EU 11 and EU 12, as described under 40 CFR 60.48c. The Permittee shall maintain these records for a period of two (2) years.

~~D.1.5 Reporting Requirements~~

~~(a) The natural gas fired boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(b) A semi-annual summary of the information to document compliance with Conditions D.1.1(a), and D.1.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Comment 9:
Conditions D.2.1(c)(2)(A)-(D) - PSD Requirements. These conditions related to total enclosure are unnecessary and not appropriate. The enclosure for 8RL has already been determined to satisfy the requirements for total enclosure. There is no requirement for Sonoco, for example, to monitor the air through the draft openings, or monitor to ensure that the draft openings do not exceed 5% of surface area, or to monitor that the draft openings equal four equivalent opening diameters, or to ensure that every single emission is captured. The criteria for U.S. EPA's total enclosure requirement were satisfied in the construction. These requirements in this permit are unnecessary and should be deleted.

Response to Comment 9:
Pursuant to CP 081-4414-00005, issued on August 28, 1995, the 8RL rotogravure press (EU 103) shall be enclosed in a permanent total enclosure. This enclosure shall meet the standards as listed in Condition D.2.1(c)(2) and CP 081-4414-00005. The enclosure requirements are standards that were established in CP 081-4414-00005 and are necessary to ensure that PSD is not triggered. Although surface area of draft openings may not change, air velocity and direction are variables and require monitoring.

Comment 10:
Condition D.2.1(c)(3) - PSD Requirements. The access doors and windows of the 8RL enclosure are only to be enclosed if openings were not included in the calculation for total enclosure per Permit No. CP081-4414. Specific subsections of the original permit were removed and should be reinserted.

Response to Comment 10:
OAQ agrees. Condition D.2.1(c)(3) has been modified accordingly. Condition D.2.1(a) has also been updated to the new permit model.

Conditions D.2.1, D.3.1, and D.3.2 have been revised based on the PSD SIP approval status. On March 3, 2003, U.S. EPA published a notice for "Conditional Approval of Implementation Plan: Indiana" in the Federal Register / Vol. 68, No.41 at pages 9892 through 9895. This notice grants conditional approval to the PSD State Implementation Plan (SIP) under provisions of 40 CFR §51.166 and 40 CFR §52.770 while superceding the delegated PSD SIP authority under 40 CFR §52.793. The effective date for these provisions is April 2, 2003. Therefore, the PSD permits will be issued under the authority of 326 IAC 2-2 and will no longer be issued under the provision of 40 CFR 52.21 and 40 CFR 124.

See Response to Comment 1* regarding the thermal oxidizer description.

D.2.1 PSD Requirements [326 IAC 2-2-3] ~~[40 CFR 52.21]~~

(a) Pursuant to SSM 081-12310-00005, issued on November 14, 2000, the total amount of organic solvent delivered to 6RL rotogravure printing press (EU 101) shall not exceed 701.88 tons per **consecutive** 12-month period, with compliance determined at the end of each month.

(b) Pursuant to CP 41-1704-00005, issued on September 22, 1988, the VOC emissions from the 6RL rotogravure printing press (EU 101) shall be controlled by a thermal ~~incinerator~~ **oxidizer** with an overall control efficiency of 76%. Therefore, this constitutes the best available control technology (BACT) requirement in 326 IAC 2-2-3 (PSD rule: best available control technology (BACT)) which satisfies the requirements of 326 IAC 8-5-5.

(c) Pursuant to CP 081-4414-00005, issued on August 28, 1995,

(1) As revised by this Title V permit, the VOC input to the 8RL rotogravure printing press (EU 103) shall be limited to 1752 tons per consecutive 12-month period, with compliance determined at the end of each month.

(2) The 8RL rotogravure press (EU 103) shall be enclosed in a permanent total enclosure. This enclosure shall meet the following conditions:

(A) Any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each VOC emitting point.

(B) The total area of all natural draft openings (NDO's) shall not exceed 5% of the surface area of the enclosure's four walls, floor, and ceiling.

(C) The average facial velocity (FV) of air through all natural draft openings (NDO's) shall be at least 3,600 m/hr (200 feet per minute). The direction of air through all NDO's shall be into the enclosure.

(D) All VOC emissions must be captured and contained for discharge through the 8RL thermal ~~incinerator~~ **oxidizer**.

(3) All access doors and windows of the 8RL enclosure **whose areas were not included in the area of all natural draft openings in the original total enclosure calculation** shall be closed during routine operation of the process.

(4) The 8RL thermal ~~incinerator~~ **oxidizer** shall operate at all times the 8RL rotogravure printing press (EU 103) is operated. When operating, the 8RL thermal ~~incinerator~~ **oxidizer** shall maintain a minimum operating temperature of 1,400°F or a temperature determined in the a compliance tests to maintain at least ninety-eight percent (98%) destruction of VOC captured. This condition satisfies the requirements of 326 IAC 8-5-5.

These conditions, combined with the input limit for the 8RL degreaser (EU 105) in Condition D.3.2, are necessary in order to limit the VOC PTE to less than 40 tons per year. Therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 ~~and 40 CFR 52.21~~, are not applicable.

D.3.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 2-2] ~~[40 CFR 52.21]~~

D.3.2 PSD Requirements [326 IAC 2-2] ~~[40 CFR 52.21]~~

Pursuant to CP 081-4414-00005, issued on August 28, 1995, and revised by this Title V permit, the VOC input to the cold cleaning degreaser EU 105 shall be limited to 4.5 tons per consecutive 12-month period, with compliance determined at the end of each month. This input limit, combined with the conditions for 8RL rotogravure press (EU 103) in Condition D.2.1(c), is necessary in order to limit the VOC PTE to less than 40 tons per year. Therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 ~~and 40 CFR 52.21~~, are not applicable.

Comment 11:
Condition D.2.4 - Printing and Publishing Industry NESHAP. Although this condition correctly notes that Lines 6RL and 8RL are subject to Subpart KK, it incorrectly indicates that increasing organic HAP usage to more than 400 kg per month requires OAQ approval.

Comment 12*:
The Printing and Publishing Industry NESHAP condition contains an incomplete and incorrect statement of the NESHAP requirements. Limiting the application of organic HAP is only one way of limiting the applicable requirements under the NESHAP to only record keeping requirements. Consequently, the last sentence of Condition D.2.4 is an incorrect statement and should be removed.

Response to Comments 11 and 12*:
Sonoco indicates that 8RL is unable to meet the compliance requirements of 40 CFR 63.821(b), and thus shall meet the requirements of 40 CFR 63.821(c). In its Notification of Compliance submitted June 29, 2001, Sonoco specified the emission limit and chosen compliance option from 40 CFR 63.825(b). Sonoco has also chosen to apply the same requirements to 6RL, and not rely on the requirements of 40 CFR 63.821(b). Sonoco has chosen to comply with the emission limit of less than 0.04 kg organic HAP per kg material applied for each month, per rotogravure printing press. No controls are being used to comply with the NESHAP. The record keeping condition has been modified accordingly. Sonoco has fulfilled the additional reporting required pursuant to 40 CFR 63.830(b)(3). Conditions D.2.4, D.2.10, D.2.16, and D.2.17 have been modified accordingly.

D.2.4 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK]

This source is subject to 326 IAC 20-18-1, 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry). A copy of this rule is attached. ~~To be subject only to the record keeping requirements of 40 CFR 63, Subpart KK, no more than 400 kg per month, for every month, of organic HAP may be applied for each rotogravure printing press, 6RL (EU 101) and 8RL (EU 103). Any change or modification to 6RL (EU 101) or 8RL (EU 103) that results in an increased organic HAP usage requires prior OAQ approval.~~

(a) Organic HAP emissions from the rotogravure printing presses, 6RL (EU 101) and 8RL (EU 103), shall be limited to no more than four percent (4%) of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for each month.

(b) Pursuant to 40 CFR 63.825(b)(4), (f)(5), and (f)(7), the Permittee shall demonstrate that the monthly average as-applied organic HAP content of all materials applied is less than 0.04 kg HAP per kg material applied, as determined by the following equation:

$$H_L = \frac{\sum_{i=1}^{p} M_i C_{hi} + \sum_{j=1}^{q} M_j C_{hj}}{\sum_{i=1}^{p} M_i + \sum_{j=1}^{q} M_j}$$

where the symbols of this equation are defined in 40 CFR 63.822(b). The organic HAP emitted from an uncontrolled press is equal to the organic HAP applied on that press.

D.2.10 ~~Volatile HAP Threshold~~ **Testing Requirements [40 CFR 63, Subpart KK] [326 IAC 20-18-1]**

~~Compliance with the volatile HAP usage contained in D.2.4 shall be determined pursuant to 40 CFR 60, Method 24, Appendix A (July 1, 2001). Method 24 shall be used to measure the total volatile HAP content and density of packaging printing inks and related coatings.~~

The organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied shall be determined pursuant to 40 CFR 63.827(b)(2).

D.2.16 Record Keeping Requirements, ~~Volatile~~ **Organic** HAP Usage [40 CFR 63.829~~(e)(2)~~] **[326 IAC 20-18-1]**

(a) In order to demonstrate compliance with Condition D.2.4, pursuant to 326 IAC 20-18-1, 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry), the following records shall be maintained on a monthly basis **for each product and packaging rotogravure press**:

~~The total volume and organic HAP content of each material applied on each product and packaging rotogravure printing press.~~

(1) Total weight of all inks, coatings, varnishes, adhesives, primers, solvents, diluents, reducers, thinners, and other materials applied.

(2) Total weight of organic HAP applied.

(b) **The Permittee shall maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 63.825.**

(c) All records shall be maintained for five years~~, and upon request, submitted to U.S. EPA~~. **At a minimum, the most recent two (2) years of data shall be retained on site.**

D.2.17 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Conditions D.2.1(a) and D.2.1(c) shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) To comply with Condition D.2.4, the owner or operator shall comply with the reporting requirements specified under 40 CFR 63.830(b)(1) **and (3)**. On June 1, 1998, the Permittee notified IDEM pursuant to 40 CFR 63.830(b)(1). **On June 29, 2001, the Permittee notified IDEM pursuant to 40 CFR 63.830(b)(3).**

Comment 13:
Condition D.2.11 - Thermal Oxidizer. Sonoco requests that the temperature set forth in this condition be set at three hour averages rather than hourly averages. Three hour averaging is consistent with the stack testing time period and with the Subpart KK time period.

Comment 14:
Condition D.2.13 - Thermal Oxidizer Temperature. Sonoco requests that the temperature set forth in this condition be set at three hour averages rather than hourly averages. Three hour averaging is consistent with the stack testing time period and with the Subpart KK time period.

Comment 15:
Condition D.4.6 - Thermal Oxidizer Temperature. Sonoco requests that this be established as a three hour average, rather than a one hour average, to be consistent with the testing time periods and to be consistent with Subpart KK.

Response to Comments 13, 14, and 15:
OAQ agrees. The changes are as follows:

D.2.11 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the 6RL thermal oxidizer for measuring operating temperature. The output of the system shall be recorded as ~~an hourly~~ **a three (3) hour** average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the 6RL thermal oxidizer at or above the ~~hourly~~ **three (3) hour** average temperature of 1,400°F.

(b) The Permittee shall determine the ~~hourly~~ **three (3) hour** average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.2.1(b), and D.2.2(a), as approved by IDEM.

(c) On and after the date approved stack test results are available, the Permittee shall operate the 6RL thermal oxidizer at or above the ~~hourly~~ **three (3) hour** average temperature as observed during the compliant stack test.

D.2.13 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the 8RL thermal Oxidizer for measuring operating temperature. The output of this system shall be recorded as ~~an hourly~~ **a three (3) hour** average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the ~~hourly~~ **three (3) hour**

average temperature of the 8RL thermal oxidizer is below 1400°F. ~~An hourly~~ **A three (3) hour** average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) The Permittee shall determine the ~~hourly~~ **three (3) hour** average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.2.1(c), as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the ~~hourly~~ **three (3) hour** average temperature of the 8RL thermal oxidizer is below the ~~hourly~~ **three (3) hour** average temperature as observed during the compliant stack test. ~~An hourly~~ **A three (3) hour** average temperature that is below the ~~hourly~~ **three (3) hour** average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.4.9 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the 8RL thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as ~~an hourly~~ **a three (3) hour** average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the ~~hourly~~ **three (3) hour** average temperature of the 8RL thermal oxidizer is below 1400°F. ~~An hourly~~ **A three (3) hour** average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) The Permittee shall determine the ~~hourly~~ **three (3) hour** average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.4.1(b), D.4.2(b), D.4.2(c), and D.4.2(d), as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the ~~hourly~~ **three (3) hour** average temperature of the 8RL thermal oxidizer is below the ~~hourly~~ **three (3) hour** average temperature as observed during the compliant stack test. ~~An hourly~~ **A three (3) hour** average temperature that is below the ~~hourly~~ **three (3) hour** average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Comment 16:
Condition D.2.12 - Parametric Monitoring. Sonoco requests that the duct pressure and fan amperage conditions be replaced with an interlock system. The duct pressure and fan amperage do not provide particularly useful information in ensuring that the oxidizer is operating. The fans can operate while the oxidizer is not operating. Sonoco believes a better parameter is an “interlock system,” and Sonoco has interlock systems in place on these lines.

Comment 17:
Condition D.2.14 - Parametric Monitoring. Sonoco requests that the duct pressure and fan amperage conditions be replaced with an interlock system. The duct pressure and fan amperage do not provide particularly useful information in ensuring that the oxidizer is operating. The fans can operate while the oxidizer is not operating. Sonoco believes a better parameter is an "interlock system," and Sonoco has interlock systems in place on these lines.

Response to Comments 16 and 17:
As Sonoco has described, its interlock system consists of an automatic shutdown on the applicable line (i.e., 8RL, 6RL, Tower 7). Each oven on a particular line has an LEL indicator. When the air/fuel (VOC) concentration in the oven is above a certain range, an automatic shutdown occurs which affects the entire line. If, for example, the 8RL oxidizer is not providing adequate air flow, the VOC concentration in the oven goes up, the LEL indicator is activated, and a shut down of the entire 8RL line occurs.

Conditions D.2.12 and D.2.14 describe monitoring methods (duct pressure or fan amperage) for measuring air flow, which are used to determine capture efficiency. The LEL does not measure air flow. It measures concentration of VOC in the oven. VOC concentration in the oven is affected by the type and amount of ink used, as well as air flow. The capture efficiency is dependent on air flow. Less capture occurs when air flow decreases. If a high VOC-content coating is being used, and adequate air flow is being maintained, a shutdown could occur due to the high VOC concentration that builds up in the oven when capture efficiency was maintained. Similarly, if a low VOC-content coating is being used, and adequate air flow is not being maintained, no shutdown would occur (because the VOC concentration might not build up to the shut-down level), and the capture efficiency would actually be lower than required.

Duct pressure or fan amperage is required to be monitored to help assure good capture efficiency. The interlock is in place to shut down the process because of VOC concentration. The interlock will not replace duct pressure or fan amperage monitoring because the interlock is not in place to monitor capture. Therefore, the condition shall remain unchanged.

Comment 18:
Condition D.2.15 - Record Keeping Requirements. Sonoco requests that the following changes be made to Condition D.2.15: (1) remove the requirement to differentiate between records used for solvents used as cleanup solvents versus solvents added to coatings because the amount used for cleanup solvents is insignificant, is not necessary to demonstrate compliance, and any needed estimate could be achieved through less onerous means; (2) remove the requirement to record the volume weighted VOC of the coatings used each day since there is no requirement applicable to this; (3) change the cleanup solvent used for each day - perhaps an annual average spread over the days would be more appropriate given the small amount of cleanup solvent used; (4) delete the requirement to record duct pressure or fan amperage since interlock systems would be more appropriate.

Comment 19*:
In addition to the changes requested in its December 23, 2002 comments to Condition D.2.15, Sonoco requests that the following changes be made: (1) modify the requirement to record the volume weighted VOC content to require the weight percent of VOC; and (2) the records relating to the cleanup solvent used should be a monthly average given the small amount of cleanup solvent used and the significant amount of time it would take to record monthly usage when cleanup solvent is only purchased on an annual basis.

Response to Comments 18 and 19*:
Condition D.2.15 has been modified to clarify the record keeping. This condition has been modified to require monthly record keeping for total VOC usage, and to include cleanup solvent VOC. Cleanup solvent VOC should be based on actual usage. Documenting usage of cleanup solvent is still necessary to show total VOC usage when demonstrating compliance with the PSD limits in Condition D.2.1.

See Response to Comments 13, 14, and 15 regarding time period for averaging temperature. See Response to Comments 16 and 17 regarding duct pressure or fan amperage record keeping requirements.

D.2.15 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1(a), D.2.1(b), D.2.1(c), D.2.2(a), D.2.2(b), and D.2.2(c), D.2.7, D.2.8(a), D.2.8(b), D.2.9, D.2.11(a), D.2.11(b), D.2.11(c), D.2.12(a), D.2.12(b), D.2.13(a), D.2.13(b), D.2.13(c), D.2.14(a), and D.2.14(b), the Permittee shall maintain records in accordance with (1) through (~~8~~ **6**) below. Records maintained for (1) through (~~8~~ **6**) shall be taken ~~daily~~ **as indicated** and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1(a), D.2.1(b), D.2.1(c), D.2.2(a), D.2.2(b), and D.2.2(c).

(1) The ~~amount and~~ VOC content of each coating material and solvent used. ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

(2) ~~A log of the dates of use;~~ **The amount of coating material and solvent less water used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

~~(3) The volume weighted VOC content of the coatings used for each day;~~

~~(4) The cleanup solvent usage for each day;~~

(~~5~~ **3**) The total VOC usage**, including cleanup solvent VOC** for each ~~day; and~~ **month.**

(~~6~~ **4**) The weight of VOCs emitted for each compliance period.

(~~7~~ **5**) The continuous temperature records (on ~~an hourly~~ **a three (3) hour** average basis) for the thermal oxidizer and the ~~hourly~~ **three (3) hour** average temperature used to demonstrate compliance during the most recent compliant stack test.

(~~8~~ **6**) Daily records of the duct pressure or fan amperage.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 20:
Section D.3 - Description. Please modify this description to indicate that the degreasers now vent through Stack 13, the 8RL oxidizer stack.

Response to Comment 20:
OAQ shall revise the degreaser descriptions under Section D.3 as follows:

One (1) cold cleaner degreasing unit, identified as EU 102, installed in 1987, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser **and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr** as control**s**, exhausting to stack ~~12~~ **13**.

One (1) cold cleaner degreasing unit, identified EU 105, installed in 1995, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is

spraying, using condenser **and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr** as control**s**, exhausting to stack ~~15~~ **13**.

Comment 21:
Condition D.3.1 - Volatile Organic Compounds (VOC) Limitations. Sonoco requests that this limitation be removed because the parts washers are now being vented to an oxidizer, and therefore this limit is no longer required. Based on Sonoco's calculations, the maximum potential emissions from the parts washers as vented through the oxidizer equals 1015 pounds per year, which is significantly less than the 8.8 tons per year currently allowed. Therefore, this limitation should be changed to indicate that the parts washers are to be vented through an oxidizer, and that operation of the oxidizer satisfies the requirements of CP (41) 1704-00005.

Comment 22:
For the reasons set forth above, Sonoco requests that the report identifying number of cycles for the cold cleaning degreaser, EU 102, be deleted.

Comment 23*:
Sonoco requests that the VOC emission limitation should be expressed in terms of tons per consecutive 12-month period rather than a limitation on the number of cycles per day or days of operation.

Response to Comments 21, 22, and 23*:
The limit in Condition D.3.1 is pursuant to CP (41) 1704-00005, issued on September 22, 1988, and 326 IAC 2-2. In order for this requirement to be re-evaluated, the source must submit a BACT analysis to OAQ. OAQ will determine an appropriate BACT. OAQ cannot remove or change the PSD BACT requirement without a proper BACT review. This would violate 326 IAC 2-2. Therefore, until the source submits a BACT analysis, the condition will remain unchanged.

The corresponding reporting form for Condition D.3.1 and degreaser EU 102 for the number of cycles per day has not been removed, since this is a federally enforceable limit. Until a new BACT is determined, based on Sonoco's BACT analysis submittal, OAQ shall require reporting for this limit.

D.3.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 2-2]

Pursuant to CP (41) 1704-00005, issued on September 22, 1988, the operation of the cold cleaning degreaser EU 102 is limited to 12 cycles per day and 350 days per consecutive 12-month period, with compliance determined at the end of each month.

Comment 24*:
Condition D.3.2 incorrectly indicates that any change in the VOC potential to emit of the 8RL degreaser requires prior OAQ approval. Whether a change in potential to emit requires prior OAQ approval is determined by the applicable provisions of 326 IAC 2, and as set forth in those regulations, not all changes require OAQ approval. In addition, the source modification requirements are already contained in Condition B.21.

Response to Comment 24*:
The limit in Condition D.3.2 is pursuant to CP 081-4414-0005, issued on August 28, 1995, 326 IAC 2-2. The 8RL rotogravure press (EU 103) and the 8RL degreaser (EU 105) were installed together as Line 8RL in the existing major source. The limit on VOC input was established as a combined condition for the 8RL rotogravure press (EU 103) and the 8RL degreaser (EU 105). The combined VOC input limits for both the 8RL rotogravure press (EU 103) and the 8RL degreaser (EU 105) were necessary to limit potential VOC emissions to less than 40 tons per year to avoid PSD.

OAQ and the Permittee agreed that the limits initially established for Line 8RL could be modified. The Permittee agreed to a more stringent VOC input limit on the 8RL rotogravure press (EU 103). The VOC input limit was reduced from 1752 to 1510 tons per year. Relying on a more stringent limit for the 8RL rotogravure press (EU 103) makes it possible to remove the VOC input limit for the 8RL degreaser (EU 105). The VOC input limit on the 8RL rotogravure press (EU 103) combined with the VOC PTE of the

8RL degreaser (EU 105) limits the VOC PTE to less than 40 tons per year. The VOC PTE was calculated thus:

VOC PTE = PTE (EU 105) + VOC input (EU 103) x (1 - 8RL overall control efficiency)

where:
PTE (EU 105) = 8.8 tons per year
VOC input 8RL press (EU 103) = 1510 tons per year
8RL thermal oxidizer, minimum overall control efficiency = 98%

Because this involves the entire Line 8RL, any change in the potential to emit of the 8RL degreaser requires prior OAQ approval. The VOC input limit on the 8RL rotogravure press (EU 103) is dependent on the VOC PTE of the 8RL degreaser (EU 105), because it was used to determine the maximum VOC input that could be used for Line 8RL and not trigger applicability of PSD. Accordingly, the input limit in Condition D.2.1(c) has been changed to less than 1510 tons per consecutive 12-month period, and the limit on the 8RL degreaser (EU 105) has been removed from Condition D.3.2.

D.2.1 PSD Requirements [326 IAC 2-2-3]

(a) Pursuant to SSM 081-12310-00005, issued on November 14, 2000, the total amount of organic solvent delivered to 6RL rotogravure printing press (EU 101) shall not exceed 701.88 tons per consecutive 12-month period, with compliance determined at the end of each month.

(b) Pursuant to CP 41-1704-00005, issued on September 22, 1988, the VOC emissions from the 6RL rotogravure printing press (EU 101) shall be controlled by a thermal oxidizer with an overall control efficiency of 76%. Therefore, this constitutes the best available control technology (BACT) requirement in 326 IAC 2-2-3 (PSD rule: best available control technology (BACT)) which satisfies the requirements of 326 IAC 8-5-5.

(c) Pursuant to CP 081-4414-00005, issued on August 28, 1995,

(a) As revised by this Title V permit, the VOC input to the 8RL rotogravure printing press (EU 103) shall be limited to ~~1752~~ **1510** tons per consecutive 12-month period, with compliance determined at the end of each month.

(b) The 8RL rotogravure press (EU 103) shall be enclosed in a permanent total enclosure. This enclosure shall meet the following conditions:

(A) Any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each VOC emitting point.

(B) The total area of all natural draft openings (NDO's) shall not exceed 5% of the surface area of the enclosure's four walls, floor, and ceiling.

(C) The average facial velocity (FV) of air through all natural draft openings (NDO's) shall be at least 3,600 m/hr (200 feet per minute). The direction of air through all NDO's shall be into the enclosure.

(D) All VOC emissions must be captured and contained for discharge through the 8RL thermal oxidizer.

(c) All access doors and windows of the 8RL enclosure whose areas were not included in the area of all natural draft openings in the original total enclosure calculation shall be closed during routine operation of the process.

(d) The 8RL thermal oxidizer shall operate at all times the 8RL rotogravure printing press (EU 103) is operated. When operating, the 8RL thermal oxidizer shall

maintain a minimum operating temperature of 1,400°F or a temperature determined in the a compliance tests to maintain at least ninety-eight percent (98%) destruction of VOC captured. This condition satisfies the requirements of 326 IAC 8-5-5.

These conditions, combined with the ~~input limit for~~ **PTE of** the 8RL degreaser (EU 105) ~~in Condition D.3.2~~, are necessary in order to limit the VOC PTE to less than 40 tons per year. Therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, are not applicable.

D.3.2 PSD Requirements [326 IAC 2-2]

Pursuant to CP 081-4414-00005, issued on August 28, 1995, and revised by this Title V permit, the VOC ~~input to~~ **PTE of** the cold cleaning degreaser EU 105 ~~shall be limited to 4.5 tons per consecutive 12-month period, with compliance determined at the end of each month. This input limit,~~ combined with the ~~conditions~~ **VOC input limit** for 8RL rotogravure press (EU 103) in Condition D.2.1(c), is necessary in order to limit the VOC PTE to less than 40 tons per year. Therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, are not applicable. **Any change or modification that changes the VOC PTE of the 8RL degreaser requires prior OAQ approval.**

Comment 25:
Conditions D.3.3 and D.3.4 - Volatile Organic Compounds (VOC). Sonoco requests an IDEM determination on which parts of these provisions apply to its degreasing operations. Sonoco's operations are totally enclosed in a similar manner as a dishwasher. The requirements under Conditions D.3.3 and D.3.4 appear either to not apply at all, or to not be directly applicable. Therefore, Sonoco requests that IDEM determine which of these actually apply and which do not apply to the Sonoco parts washing operation.

Comment 26*:
In particular, Sonoco believes that the requirements of D.3.3(a) through (d), D.3.4(a)(1) through (2), D.3.4(a)(4) through (5), and D.3.4(b)(1) through (2) are inapplicable to its operation. Therefore, Sonoco requests that IDEM determine that these requirements do not apply or that Sonoco's operations satisfy the requirements of these conditions.

Response to Comments 25 and 26*:
Both degreasing units, EU 102 and EU 105, are subject to the requirements of 326 IAC 8-3-2, because they were each installed after January 1, 1980, and are located anywhere in the state. The degreasing unit EU 105 is subject to the requirements of 326 IAC 8-3-5 because it is located in Johnson County and was installed after July 1, 1990. Rule applicability is based on the degreaser location and installation date. The unit must comply with all provisions of the rule regardless of initial design. If, for example, the degreaser purchased by the source does not come equipped with a cover, it is the source's responsibility to equip the unit with a cover. This philosophy applies to the rest of the rule. If Sonoco has questions regarding compliance or certification of compliance with these rules, please call the Air Compliance Inspector for the source, Mr. Vaughn Ison, at 317-233-0432.

Comment 27:
Conditions D.3.5 - Record Keeping Requirements and D.3.6 - Reporting Requirements. Sonoco requests that these conditions be deleted because the emissions from the parts washers are now vented through an oxidizer such that these records are no longer needed and the corresponding limitations are no longer needed.

Response to Comment 27:
Record keeping is still required to document compliance with Condition D.3.2. Accordingly, Condition D.3.5(b) has been updated to the new permit model and revised to change the record keeping requirements. See also Response to Comments 18 and 19*.

Condition D.3.6 has been revised to remove reporting requirements for the 8RL degreaser (EU 105). Additionally, the quarterly reporting form for the 8RL press (EU 103) and 8RL degreaser (105) has been modified to reflect the new VOC input limit for the 8RL press (EU 103). References to the 8RL degreaser (EU 105) and associated VOC input limits have been removed.

D.3.5 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall maintain daily records in accordance with (1) through (2) below. These records shall be complete and sufficient to establish compliance with the usage limits established in Condition D.3.1.

(1) A log of the dates of use; and

(2) A daily log indicating the number of cycles run per day.

(b) To document compliance with Condition D.3.2, the Permittee shall maintain records in accordance with (1) through (~~6~~ **3**) below. Records maintained for (1) through (~~6~~ **3**) shall be taken ~~daily~~ **monthly** and shall be complete and sufficient to establish compliance with the VOC usage ~~limits and/or the VOC emission limits~~ established in Condition D.3.2.

(1) The amount and VOC ~~and HAP~~ content of ~~each coating material and~~ solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~(2) A log of the dates of use;~~

~~(3) The volume weighted VOC and HAP content of the coatings used for each day;~~

~~(4) The cleanup solvent usage for each day;~~

(~~5~~ **2**) The total VOC ~~and HAP~~ usage for each ~~day; and~~ **month.**

(~~6~~ **3**) The weight of VOC ~~and HAP~~ emitted for each compliance period.

(c) These records shall be maintained in accordance with Section C - General Record Keeping Requirements.

D.3.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition~~s~~ D.3.1~~, and D.3.2~~ shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
Part 70 Quarterly Report

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005
Facility: 8RL Press (EU 103)~~/8RL cold cleaning degreaser (EU 105)~~

Parameter: VOC Input (tons)
Limit: ~~1752~~ **1510** tons per consecutive 12-month period VOC input to EU 103 ~~and 4.5 tons per consecutive 12-month period VOC input to EU 105. The combined input limits are necessary in order to limit the PTE to less than 40 tons per year.~~

QUARTER/YEAR: _____

~~Unit~~ **Reporting Period**		Current Month	Previous 11 Months (Total)	12-Month Period (TOTAL)
		VOC Input* (tons)	VOC Input* (tons)	VOC Input* (tons)
Quarter Month 1	~~8RL Press~~			
	~~8RL Degreaser~~			
Quarter Month 2	~~8RL Press~~			
	~~8RL Degreaser~~			
Quarter Month 3	~~8RL Press~~			
	~~8RL Degreaser~~			

* VOC input for ~~each of~~ the unit~~s~~ above can be calculated from the equation~~s~~ given below.
~~(1)~~ VOC input for 8RL Press EU 103 = [(gallons of ink used * density * weight percent VOC) + (gallons of solvent used * solvent density) + (gallons of adhesive used * adhesive density * weight percent VOC)] / 2000

~~(2) VOC input for 8RL degreaser EU 105 = (gallons of solvent used * density) / 2000~~

Change D-1:
Condition D.4.11 is revised to reflect the correct averaging time.

D.4.11 Record Keeping Requirements

(a) To document compliance with Conditions D.4.1(a), D.4.1(b), D.4.4(a), D.4.4(b), D.4.7, D.4.9(a), and D.4.10(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1(a) and D.4.1(b).

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage, including cleanup solvent VOC for each day.

(4) The weight of VOCs emitted for each compliance period.

(5) The continuous temperature records (on ~~an hourly~~ **three (3) hour** average basis) for the thermal oxidizer when coatings containing VOC are being used and the ~~hourly~~ **three (3) hour** average temperature used to demonstrate compliance during the most recent compliant stack test.

(6) Daily records of the duct pressure or fan amperage when coatings containing VOC are being used.

(b) To document compliance with Conditions D.4.2(a), D.4.4(a), and D.4.4(b), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.2(a).

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage, including cleanup solvent VOC for each day.

(4) The weight of total VOC used for each compliance period.

(c) To document compliance with Conditions D.4.2(b), D.4.2(c), D.4.2(d), D.4.4(a), D.4.5, D.4.6, D.4.8, D.4.9(a), D.4.9(b), D.4.9(c), D.4.10(a), and D.4.10(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.2(b), D.4.2(c), and D.4.2(d).

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The total VOC usage for each day.

(4) The weight of VOCs emitted for each compliance period.

(5) The continuous temperature records (on ~~an hourly~~ **a three (3) hour** average basis) for the thermal oxidizer when non-compliant coatings are being used and the ~~hourly~~ **three (3) hour** average temperature used to demonstrate compliance during the most recent compliant stack test.

(6) Daily records of the duct pressure or fan amperage when non-compliant coatings are being used.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 28:
Condition D.4.1(c) - Volatile Organic Compound (VOC) Emissions Limitations. The reference to an overall control efficiency of 81% should be deleted because the required control efficiency to ensure compliance with the 2.9 pounds VOC per gallon of coating would depend on the amount of VOC in the particular coating being utilized. In addition, the “duct velocity” requirement should be removed because it is not necessary.

Comment 29*:
Condition D.4.1 incorrectly states the compliance requirements under 326 IAC 8-1-2. Subsection (c) requires only the actual solvent density to be used in assessing compliance when, in fact, compliance is determined using actual solvent density *and* actual VOC content of the coating used. In addition, the requirement to achieve a minimum overall control efficiency of 81% incorrectly states the requirements of 326 IAC 8-1-2(c), which establishes the method for determining the required control efficiency based on the actual VOC content of the coating being used.

Response to Comments 28 and 29*:
Condition D.4.1 has been renumbered as D.4.2. New Condition D.4.1 has been added to the permit. Based on the VOC PTE, the 6X laminator requires an input limit of 1999 tons VOC per consecutive 12 month period combined with the required use of the 8RL thermal oxidizer at a 98% overall efficiency to control 6X VOC emissions. This limits 6X VOC emissions to less than 40 tons per consecutive 12 month period, and avoids the requirements of PSD under 326 IAC 2-2. Therefore, a quarterly reporting form for demonstrating compliance with this condition has been added to the permit. Subsequent conditions have been renumbered accordingly.

Condition D.4.2(a) has been revised to indicate VOC input, rather than solvent input. Accordingly, the 5X Quarterly Report has been revised.

Pursuant to CP 081-5840-00005, issued on January 24, 1997, and 326 IAC 8-1-2(a), the two coating stations of the 6X line shall be controlled by the 8RL thermal oxidizer and capture system any time coatings are applied which have a VOC content in excess of 2.9 pounds VOC per gallon of coating less water. OAQ calculated the efficiency pursuant to 326 IAC 8-1-2(c). Since this efficiency is not a requirement pursuant to 326 IAC 8-2-5, OAQ shall move this determination to Condition D.4.2(d). Accordingly, Condition D.4.2(c) has been modified to include the equivalency limit pursuant to 326 IAC 8-1-2(b). Language has been added to clarify that Conditions D.4.2(c) and D.4.2(d) apply to the 6X line and the 8RL thermal oxidizer only when non-compliant coatings are being used. Condition D.4.2(d) has been changed to show a 98% overall efficiency for the 8RL thermal oxidizer when non-compliant coatings are being used. The necessary efficiency was re-evaluated based on worst-case coating information over a 24-hour period. Section D.4 has been modified accordingly.

Condition D.4.9 has been renumbered as D.4.12. This condition has been modified to require reporting for compliance with new Condition D.4.1(a), as well as for Condition D.4.2(a).

Regarding duct velocity, see Response to Comments 16 and 17. See Response to Comment 1* regarding the thermal oxidizer description.

D.4.1 PSD Requirements [326 IAC 2-2]

(a) VOC input to the 6X extrusion coater/laminator (EU 204) shall be limited to 1999 tons per consecutive twelve (12) month period, with compliance determined at the end of each month.

(b) VOC emissions from the 6X extrusion coater/laminator (EU 204) shall be controlled by the 8RL thermal oxidizer with an overall efficiency of 98%. This condition satisfies the requirements of 326 IAC 8-1-2 and 326 IAC 8-2-5.

This limits potential VOC emissions from the 6X extrusion coater/laminator (EU 204) to less than 40 tons per consecutive twelve (12) month period. Therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, are not applicable. Any change or modification that changes the potential VOC emissions of the 6X extrusion coater/laminator (EU 204) requires prior OAQ approval.

D.4.~~1~~ **2** Volatile Organic Compound (VOC) Emissions Limitations [326 IAC 8-2-5] **[326 IAC 8-1-2]**

(a) ~~Solvent~~ **VOC** input to the 5X extrusion coater/laminator (EU 201) shall be less than 25 tons per consecutive 12-month period, with compliance determined at the end of each

month. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per year. Compliance with this limit makes 326 IAC 8-2-5 (Paper Coating Operations) not applicable.

(b) Pursuant to 326 IAC 8-2-5(b), the Permittee shall not cause, allow, or permit the discharge into the atmosphere any volatile organic compounds (VOC) in excess of 2.9 pounds VOC per gallon of coating excluding water delivered to the coating applicator from the 6X coating line (EU 204).

The following conditions apply to the 6X coating line (EU 204) and the 8RL thermal oxidizer when non-compliant coatings are being used:

(c) ~~To achieve compliance with 326 IAC 8-2-5, pursuant to 326 IAC 8-1-2(c), 6X coating stations 1 and 2 shall be controlled by the existing permitted 24.0 MMBtu/hr 8RL thermal oxidizer when coatings are applied which have a VOC content in excess of 2.9 pounds VOC per gallon of coating less water operating at a minimum temperature of 1,400°F, or a temperature and duct velocity determined in the compliance tests to maintain an overall control efficiency of 81%, and a minimum destruction efficiency of 98%.~~ **Pursuant to 326 IAC 8-1-2(b), VOC emissions from the 6X coating line (EU 204) shall be limited to less than 4.8 pounds of VOC per gallon of coating solids. This equivalent limit was determined by using the following equation:**

E = L / (1 - L/D)

Where:

L	**=**	**Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating**
D	**=**	**Density of VOC in coating in pounds per gallon of VOC**
E	**=**	**Equivalent emission limit in pounds of VOC per gallon of coating solids as applied**

A solvent density of 7.36 pounds of VOC per gallon of solvent was used to determine the equivalent emission limit in pounds of VOC per gallon of coating solids as applied for the applicable emission limit contained in 326 IAC 8-2-5.

(d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the 6X coating line (EU 204) and the 8RL thermal oxidizer shall be no less than 98%. The equivalent overall efficiency was calculated by the following equation:

$$O = \frac{V - E}{V} x100$$

Where:

V	**=**	**The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.**
E	**=**	**Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.**
O	**=**	**Equivalent overall efficiency of the capture system and control device as a percentage.**

D.4.~~2~~ **3** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each extrusion coater/laminator, 5X (EU 201) and 6X (EU 204), and the 6X control device (8RL thermal ~~incinerator~~ **oxidizer**, described in Section D.2).

D.4.~~3~~ **4** Volatile Organic Compounds (VOC) Content and Usage

(a) Compliance with the VOC content and usage limitations contained in Conditions D.4.1(a), ~~D.4.1(b)~~ **D.4.2(a)**, **D.4.2(b), D.4.2(c),** and ~~D.4.1(c)~~ **D.4.2(d)** shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with Conditions D.4.1(a)~~, D.4.1(b),~~ and ~~D.4.1(c)~~ **D.4.2(a)** shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent month.

D.4.~~9~~ **12** Reporting Requirements

A quarterly summary of the information to document compliance with Condition**s** D.4.1(a) **and D.4.2(a)** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005
Facility: 5X extrusion coater/laminator, EU 201
Parameter: ~~Solvent~~ **VOC** input
Limit: Less than 25 tons per consecutive 12-month period

Months: _____ Year: _____

Reporting Period	Current Month	Previous 11 Months (Total)	12-Month Period (TOTAL)
	~~Solvent~~ **VOC** Input (tons)	~~Solvent~~ **VOC** Input (tons)	~~Solvent~~ **VOC** Input (tons)
Quarter Month 1			
Quarter Month 2			
Quarter Month 3			

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Sonoco Flexible Packaging
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188
Part 70 Permit No.: T081-7183-00005
Facility: 6X extrusion coater/laminator, EU 204
Parameter: VOC input
Limit: 1999 tons per consecutive 12-month period

Months: _____ Year: _____

Reporting Period	Current Month	Previous 11 Months (Total)	12-Month Period (TOTAL)
	VOC Input (tons)	VOC Input (tons)	VOC Input (tons)
Quarter Month 1			
Quarter Month 2			
Quarter Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Comment 30*:
Condition D.4.4 - Volatile Organic Compounds (VOC) is duplicative of the requirements already contained in Condition D.4.1. In addition, operation of the thermal oxidizer is not required to achieve compliance with the requirement of D.4.1(b) to limit emissions of VOC to less than 2.9 pounds VOC per gallon of coating.

Response to Comment 30*:
Condition D.4.4 was added as an update to the permit. It has been renumbered as Condition D.4.5. Operation of the thermal oxidizer is necessary for compliance with Condition D.4.2(b) when non-compliant coatings are being used. This is Sonoco's chosen method of compliance. Also, use of the 8RL oxidizer is necessary to comply with Condition D.4.1 when coatings containing VOC are used. Therefore, the 8RL oxidizer should already be in use any time non-compliant coatings are used. This condition has been modified. Also see Response to Comments 28 and 29*.

D.4.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the 8RL thermal oxidizer to achieve compliance with Conditions D.4.2(b) and D.4.2(d).

Comment 31:
Condition D.4.4 - Testing Requirements. Since the emissions from Line 6X will be going through the 8RL oxidizer, it would appear that only one test be required on the 8RL oxidizer. That requirement already exists in Condition D.2.8(b). Therefore, Condition D.4.4 should be deleted since a testing requirement already exists for the 8RL oxidizer.

Comment 32*:
As set forth in our comments of December 23, 2002, it would appear that only one test be required on the 8RL oxidizer and that requirement already exists in Condition D.2.8(b). Even if IDEM believes this requirement to be necessary, the requirement should be consistent with the requirements in D.2.8(b) and include the reference to perform testing utilizing Methods 24 and 25.

Response to Comments 31 and 32*:
A previous change has resulted in Condition D.4.4 being renumbered as Condition D.4.6. The testing requirement in Condition D.4.6 is necessary to determine the overall control efficiency of the 6X coating line and the 8RL oxidizer. Periodic testing is appropriate for a controlled unit of this size. Conditions D.4.6 and D.2.8 have been revised to simplify performance testing by citing to and otherwise relying on the Section C conditions regarding testing. Revisions have also been made to make the conditions consistent with each other.

Condition D.4.7 was added as an update to the permit to require compliance monitoring for Condition D.4.1. This requirement monitors use of the bypass. Directing emissions to the oxidizer is required when VOC-containing coatings are being used.

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) During the period within 30 and 36 months after issuance of this permit, the Permittee shall ~~perform VOC testing~~ **conduct a performance test to verify VOC control efficiency as per Conditions D2.1(b) and D.2.2(a) for the 6RL rotogravure printing press (EU 101) and the 6RL thermal oxidizer** utilizing ~~Methods 24 and 25 (40 CFR 60, Appendix A) or other~~ methods as approved by the Commissioner. ~~This test shall determine the overall control efficiency (capture efficiency and destruction efficiency) of the 6RL thermal incinerator. The operating temperature of the 6RL thermal incinerator shall be recorded during the test and incorporated as a condition in the permit. These tests shall be performed according to 326 IAC 3-6 (Source Sampling Procedures).~~ This test shall be repeated at least once every 2.5 years from the date of this valid compliance demonstration. ~~In addition to these requirements, IDEM may require compliance testing for VOC or for HAPS when necessary to determine if the facility is in compliance.~~ **Testing shall be conducted in accordance with Section C - Performance Testing.**

(b) During the period within 30 and 36 months after issuance of this permit, the Permittee shall ~~perform VOC testing~~ **conduct a performance test to verify VOC control efficiency as per Conditions D.2.1(c), D.2.2(b), and D.2.2(c) for the 8RL rotogravure printing press (EU 103) and the 8RL thermal oxidizer** utilizing ~~Methods 24 and 25 (40~~

~~CFR 60, Appendix A) or other~~ methods as approved by the Commissioner. ~~This test shall determine the overall control efficiency (capture efficiency and destruction efficiency) of the 8RL thermal incinerator. The operating temperature of the 8RL thermal incinerator shall be recorded during the test and incorporated as a condition in the permit. These tests shall be performed according to 326 IAC 3-6 (Source Sampling Procedures).~~ This test shall be repeated at least once every 2.5 years from the date of this valid compliance demonstration. ~~In addition to these requirements, IDEM may require compliance testing for VOC or for HAPS when necessary to determine if the facility is in compliance.~~ **Testing shall be conducted in accordance with Section C - Performance Testing.**

D.4.~~4~~ **6** Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period within 30 and 36 months after issuance of this permit, the Permittee shall ~~perform VOC testing utilizing Methods 24 and 25 (40 CFR 60, Appendix A) or other methods~~ **conduct a performance test to verify VOC control efficiency as per Conditions D.4.1(b) and D.4.2(d) for the 6X coating line (EU 204) and the 8RL thermal oxidizer utilizing methods** as approved by the Commissioner. ~~This test shall determine the overall control efficiency (capture efficiency and destruction efficiency) of the 6X extrusion coater/laminator (EU 204). The operating temperature of the 8RL thermal incinerator shall be recorded during the test and incorporated as a condition in the permit. These tests shall be performed according to 326 IAC 3-6 (Source Sampling Procedures).~~ This test shall be repeated at least once every 2.5 years from the date of this valid compliance demonstration. ~~In addition to these requirements, IDEM may require compliance testing for VOC or for HAPS when necessary to determine if the facility is in compliance.~~ **Testing shall be conducted in accordance with Section C - Performance Testing.**

D.4.7 Compliance Monitoring Conditions for PSD

To monitor compliance with Condition D.4.1(b), the 6X extrusion coater/laminator (EU 204) has the following applicable compliance monitoring conditions: The controller on the bypass damper in the vent line from the two coating station dryers to the thermal oxidizer will be connected to a strip chart record which will continuously record the positioning of the damper. The date and time will also be recorded on the strip chart. The strip chart recording compared with each job's schedule and coating calculations will confirm the use of the 8RL thermal oxidizer whenever coatings containing VOC are applied.

Comment 33*:
Use of the thermal oxidizer is not required for compliance with Condition D.4.1(b). Condition D.4.6 - Compliance Monitoring Conditions should be modified.

Response to Comment 33*:
Condition D.4.6 has been renumbered as Condition D.4.9. Sonoco has chosen the thermal oxidizer to comply with Condition D.4.1. Compliance monitoring will be required to demonstrate compliance with this condition. Since the thermal oxidizer shall be used to comply with Condition D.4.1 when VOC-containing coatings are used, the thermal oxidizer is also the chosen method to comply with the limit in Condition D.4.2(b). Meeting the more stringent requirements of Condition D.4.1 satisfies the requirements of Condition D.4.2 for 6X. Even though intermittent control and monitoring is outlined for 6X compliance with Condition D.4.2, use of any VOC-containing coating requires the thermal oxidizer to comply with Condition D.4.1. See Response to Comments 28 and 29*, and Response to Comment 30*.

D.4.~~5~~ **8** Compliance Monitoring Conditions [326 IAC 8-2-5]

To monitor compliance with Conditions ~~D.4.1(b)~~ **D.4.2(b), D.4.2(c),** and ~~D.4.1(c)~~ **D.4.2(d)**, pursuant to CP 081-5840-00005, issued on January 24, 1997, the 6X extrusion coater/laminator (EU 204) has the following applicable compliance monitoring conditions: The controller on the bypass damper in the vent line from the two coating station dryers to the thermal oxidizer will be connected to a strip chart record which will continuously record the positioning of the damper. The date and time will also be recorded on the strip chart. The strip chart recording compared

with each job's schedule and coating calculations will confirm the use of the 8RL thermal oxidizer whenever non-compliant coatings are applied.

D.4.~~6~~ **9** Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the 8RL thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three (3) hour average temperature of the 8RL thermal oxidizer is below 1400°F. A three (3) hour average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition**s** ~~D.2.1(c)~~ **D.4.1(b), D.4.2(b), D.4.2(c), and D.4.2(d)**, as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three (3) hour average temperature of the 8RL thermal oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Comment 34:
Condition D.4.7 - Parametric Monitoring. This requirement to determine duct pressure or fan amperage should be deleted. This parameter is not appropriate for these circumstances. In addition, Line 6X does not commonly vent to the oxidizer depending on the coatings that are used. In addition, a strip chart would provide sufficient information on whether the vent is going through the oxidizer.

Comment 35*:
The use of the thermal oxidizer is not necessary for compliance with Condition D.4.1(b).

Response to Comments 34 and 35*:
Condition D.4.7 has been renumbered to Condition D.4.10. Parametric monitoring is required when non-compliant coatings are being used. Duct pressure or fan amperage is used as an indicator for capture efficiency. When non-compliant coatings are being used, the strip chart requirement in renumbered Condition D.4.8 ensures that 6X emissions are being routed to the 8RL oxidizer. Use of the 8RL oxidizer is necessary for compliance with renumbered Condition D.4.2(b) when non-compliant coatings are being used. Condition D.4.10(a) has been corrected to require compliance monitoring for 6X Condition D.4.1(b). Condition D.4.10(b) has been changed to clarify that duct pressure or fan amperage readings for 6X are only required when non-compliant coatings are being used. Also, see Response to Comments 16 and 17.

D.4.~~7~~ **10** Parametric Monitoring

(a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Condition**s** ~~D.2.1(c)~~ **D.4.1(b), D.4.2(b), D.4.2(c), and D.4.2(d)**, as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when**:**

(1) coatings containing VOC are being used and the 8RL thermal oxidizer is in operation.

(2) non-compliant coatings are being used and the 8RL thermal oxidizer is in operation.

When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Comment 36:
Condition D.4.8 - Record Keeping Requirements. Sonoco requests that the following changes be made to Condition D.4.8: (1) remove the requirement to differentiate between records used for solvents used as cleanup solvents versus solvents added to coatings because the amount used for cleanup solvents is insignificant, is not necessary to demonstrate compliance, and any needed estimate could be achieved through less onerous means; (2) remove the requirement to record the volume weighted VOC of the coatings used each day since there is no requirement applicable to this; (3) change the cleanup solvent used for each day - perhaps an annual average spread over the days would be more appropriate given the small amount of cleanup solvent used; (4) delete the requirement to maintain records of duct pressure or fan amperage since interlock systems would be more appropriate.

Comment 37*:
In addition to the changes requested in its December 23, 2002 comments, Sonoco requests that the following changes be made to Condition D.4.8: (1) modify the requirement to record the volume weighted VOC content to require the weight percent of VOC; and (2) the records relating to the cleanup solvent used should be a monthly average given the small amount of cleanup solvent used and the significant amount of time it would take to record monthly usage when cleanup solvent is only purchased on an annual basis.

Response to Comments 36 and 37*:
Condition D.4.8 has been renumbered to Condition D.4.11. Condition D.4.11 has been modified to clarify the record keeping requirements.

The Permittee has requested that the record keeping requirements for Conditions D.4.1(a) and D.4.1(b) be listed separately from those required for Conditions D.4.2(b), D.4.2(c), and D.4.2(d). These requirements are listed under Conditions D.4.11(a) and D.4.11(c), respectively.

Conditions D.4.11(a) and D.4.11(b) have been modified to require monthly record keeping for total VOC usage, and to include cleanup solvent VOC. Cleanup solvent VOC should be based on actual usage. Documenting usage of cleanup solvent is necessary to show total VOC usage when demonstrating compliance with the PSD limit in Condition D.4.1(a). It is also necessary when demonstrating compliance with the VOC input limit in Condition D.4.2(a). See Response to Comments 18 and 19*.

See Response to Comments 16 and 17 regarding duct pressure or fan amperage record keeping requirements.

D.4.~~8~~ **11** Record Keeping Requirements

(a) To document compliance with Conditions D.4.1(a), D.4.1(b), ~~D.4.1(c)~~ **D.4.4(a)**, ~~D.4.3(a)~~ **D.4.4(b)**, ~~D.4.3(b)~~ **D.4.7**, ~~D.4.4~~, ~~D.4.5~~, ~~D.4.6(a)~~, ~~D.4.6(b)~~, ~~D.4.6(c)~~, ~~D.4.7(a)~~ **D.4.9(a)**, and ~~D.4.7(b)~~ D.4.10(b), the Permittee shall maintain records in accordance with (1) through (~~8~~ **6**) below. Records maintained for (1) through (~~8~~ **6**) shall be taken ~~daily~~ **as indicated** and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1(a)~~,~~ **and** D.4.1(b)~~, and D.4.1(c)~~.

(1) The ~~amount and~~ VOC content of each coating material and solvent used. ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

(2) ~~A log of the dates of use;~~ **The amount of coating material and solvent less water used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

~~(3) The volume weighted VOC content of the coatings used for each day;~~

~~(4) The cleanup solvent usage for each day;~~

(~~5~~ **3**) The total VOC usage**, including cleanup solvent VOC** for each day~~; and~~**.**

(~~6~~ **4**) The weight of VOCs emitted for each compliance period.

(~~7~~ **5**) The continuous temperature records (on an hourly average basis) for the thermal oxidizer **when coatings containing VOC are being used** and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test.

(~~8~~ **6**) Daily records of the duct pressure or fan amperage **when coatings containing VOC are being used**.

(b) **To document compliance with Conditions D.4.2(a), D.4.4(a), and D.4.4(b), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as indicated and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.2(a).**

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage, including cleanup solvent VOC for each day.

(4) The weight of total VOC used for each compliance period.

(a) To document compliance with Conditions D.4.2(b), D.4.2(c), D.4.2(d), D.4.4(a), D.4.5, D.4.6, D.4.8, D.4.9(a), D.4.9(b), D.4.9(c), D.4.10(a), and D.4.10(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as indicated and shall be complete

and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.2(b), D.4.2(c), and D.4.2(d).

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The total VOC usage for each day.

(4) The weight of VOCs emitted for each compliance period.

(5) The continuous temperature records (on an hourly average basis) for the thermal oxidizer when non-compliant coatings are being used and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test.

(6) Daily records of the duct pressure or fan amperage when non-compliant coatings are being used.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 38*:
The Tower 7 coating booth is a grand fathered and uncontrolled emission unit. Accordingly, Condition D.5.1 should be deleted.

Response to Comment 38*:
Since the 40 CFR Part 63, Subpart JJJJ's compliance determination date has not passed and no other rules apply, the Permittee will not be required to maintain a PMP. Once the compliance date passes, the Permittee will be required to follow the Operation, Maintenance, and Monitoring (OMM) Plan as listed in the NESHAP.

Comment 39*:
The Paper and Other Web Coating NESHAP in Condition D.5.2 requires submission of an initial notification and therefore, Condition D.5.2 should be modified.

Response to Comment 39*:
Pursuant to 40 CFR 63.3290, Subpart JJJJ, the Paper and Other Web Coating NESHAP applies to each new and existing major source of HAP at which web coating lines are operated. Condition D.5.2 was added after the November 28, 2002 publication of the notice of public comment period to include the new NESHAP for Paper and Other Web Coating, 40 CFR 63, Subpart JJJJ. The effective date of Subpart JJJJ is December 4, 2002. The source must show compliance by December 5, 2005. Pursuant to 40 CFR 63.9, the Permittee shall notify IDEM and U.S. EPA no later than one year prior to the compliance date. OAQ agrees with the Permittee's comment. This condition has been modified accordingly.

D.5.1 Paper and Other Web Coating NESHAP [40 CFR 63, Subpart JJJJ]

The Permittee shall submit an initial notification to IDEM, OAQ and U.S. EPA no later than one year prior to the initial compliance date, which is December 5, 2005. The initial notification shall contain all the information required in 40 CFR 63.9 that is appropriate for the facility.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Sonoco Flexible Packaging**
Source Location:	**6502 S. U.S. Highway 31, Edinburgh, IN 46124**
County:	**Johnson**
SIC Code:	**2671, 2754, 2759**
Operation Permit No.:	**T081-7183-00005**
Permit Reviewer:	**Chrystal Wagner**

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Sonoco Flexible Packaging relating to the operation for coated and laminated materials and commercial printing operations.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) 11-station 6RL rotogravure printing press with adhesive coating/lamination station, identified as EU 101, installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal incineration as control which is fueled by natural gas at a heat input rate of 11.2 MMBtu/hr, exhausting to stack 11.

(b) One (1) cold cleaner degreasing unit, identified as EU 102, installed in 1987, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser as control, exhausting to stack 12.

(c) One (1) 11-station 8RL rotogravure printing press with adhesive coating/lamination station, identified as EU 103, installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a total permanent enclosure, using thermal incineration as control which is fueled by natural gas at a heat input rate of 24.0 MMBtu/hr, exhausting to stack 13.

(d) One (1) cold cleaner degreasing unit, identified EU 105, installed in 1995, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser as control, exhausting to stack 15.

(e) One (1) 5X extrusion coater/laminator, identified as EU 201, installed in 1987, product being coated is web substrate packaging material, application method used is roll coating, exhausting to stack 21. EU 201 consists of the following units:

(1) One (1) extrusion laminator

(2) One (1) coating/adhesive lamination deck

(3) One (1) coating deck

(4) Two (2) coating station dryers

(f) One (1) Tower 7 coating booth, identified as EU 202, installed in 1970, product being coated is paper, picture mounting, application method used is meyer rod coating, exhausting to stacks 22, 23, 24, 25, and 26.

(g) One (1) 6X extrusion coater/laminator, identified as EU 204, installed in 1996, product being coated is web substrate packaging material, application method used is roll coating, using thermal incineration as control which is fueled by natural gas at a heat input rate of 24.0 MMBtu/hr exhausting to stack 13. EU 204 consists of the following units:

(1) Two (2) extrusion laminators

(2) Two (2) coating/adhesive lamination stations, identified as No. 1 and No. 2, each utilizing a gravure cylinder application system, each with a permanent total enclosure capture system, each coating a maximum of 43.2 million (MM) square inches per hour

(3) Two (2) coating/adhesive lamination station dryers, each rated at 1.5 MMBtu/hr

Existing Equipment Removed*

The source has removed the following unpermitted facilities/units:

(a) Three (3) boilers (Nos. 1, 2, and 3), fueled by natural gas, identified as EU 11, EU 12, and EU 13, replaced in 1997 and 1998 by two (2) boilers, listed in the following section.

(b) One (1) Line 2 flexographic press, identified as EU 107, installed in 1956, having a maximum line speed of 400 ft/min and a maximum printing width of 42 inches exhausting to stacks 18 and 19. The Line 2 flexographic press was removed in July 2001.

* Equipment listed in the original application, with no written notice of removal. Written notice was received regarding removal of 14L laminator and 15C flexographic press; therefore, they are not listed in this TSD.

Unpermitted Emission Units and Pollution Control Equipment**

The source also consists of the following unpermitted facilities/units:

(a) One (1) boiler, fueled by natural gas, backup fuel is propane, identified as Boiler EU 11 (No. 1) having a heat input capacity of 20.925 MMBtu/hr exhausting to stack 01, installed in 1997.

(b) One (1) boiler fueled by natural gas, backup fuel is propane, identified as Boiler EU 12 (No. 2) having a heat input capacity of 20.925 MMBtu/hr exhausting to stack 02, installed in 1998.

** Installed equipment subsequent to IDEM's receipt of application. Any enforcement issue regarding equipment listed in this section has been resolved.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Space heaters, process heaters, or boilers using the following fuels:

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(2) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

(b) Combustion source flame safety purging on startup.

(c) The following VOC and HAP storage containers:

Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(d) Equipment used exclusively for the following:

(1) Packaging lubricants or greases.

(2) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3].

(f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

(g) Closed loop heating and cooling systems.

(h) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(i) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

(j) Conveyors as follows:

Enclosed systems for conveying plastic raw materials and plastic finished goods.

(k) Purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(l) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(m) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(n) Other emergency equipment as follows:

Stationary fire pumps.

(o) A laboratory as defined in 326 IAC 2-7(20)(c).

(p) Other categories with emissions below insignificant thresholds:

(1) Ink mixing room.

(2) Tower 7 coating mixing room - toluene.

(3) 15 inch proof press for product development work.

(4) Storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC:

(A) Two (2) 10,000 gallon solvent storage tanks with conservation vents.

(B) One (1) 6, 000 gallon toluene storage tank with conservation vent.

(C) One (1) 6,000 gallon solvent storage tank with conservation vent.

(D) One (1) 4,000 gallon solvent storage tank with conservation vent.

(5) Two (2) ink jet printers.

(6) Seven (7) slitters.

(7) Three (3) rewinders.

(8) One (1) Line 2 extrusion coater, extruding solvent-free thermoplastic resin, product being coated is paper or metallic foil.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) SSM 081-12310-00005, issued on November 14, 2000,

(b) Amendment CP 081-8676-00005, issued on June 27, 1997,

(c) Amendment CP 081-5786-00005, issued on February 17, 1997,

(d) CP 081-5840-00005, issued on January 24, 1997,

(e) Interim CP I-081-5840-00005, issued on June 3, 1996,

(f) CP 081-4414-00005, issued on August 28, 1995,

(g) Interim CP I-081-4414-00005, issued on April 6, 1995,

(h) CP (41) 1884-00005, issued on December 11, 1991*,

(i) CP (41) 1883-00005, issued on February 18, 1991,

(j) OP 41-12-92-0092, issued on December 22, 1988,

(k) CP (41) 1704-00005, issued on September 22, 1988,

(l) Exemption, no permit number was provided, issued on May 18, 1988 and

(m) Registration, no permit number was provided, issued on June 15, 1987.

*This permit (CP (41) 1884-00005) was for a proposed No.1 Press (P-3 press). This press was installed, but never operated. The No. 1 Press was removed from the site on January 31, 1996. Therefore, this permit and requirements contained in this permit are not considered in effect.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(a) SSM 081-12310-00005, issued on November 14, 2000

Condition (condition C.6):

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

Reason not incorporated:

This requirement does not apply to the source because the potential to emit of particulate matter and sulfur dioxide is less than twenty-five (25) tons per year each.

(b) CP 081-4414-00005, issued on August 28, 1995

Condition (condition 5):

(1) That the VOC input to the press shall be limited to 146 tons per month.

(2) That the VOC input to the parts washer should be limited to 0.375 tons (750 pounds) per month.

Reason not incorporated:

The input limits for both the 8RL rotogravure press EU 103 and the 8RL cold cleaning degreaser EU 105 have been changed to be expressed in terms of tons per consecutive 12-month period, instead of tons per month. This does not change the intent of the limit on either facility, but describes each limit in terms as they are currently applied. Expressing the input limit in terms of an annual limit for a compliance determination period is more practical.

(c) CP (41) 1883-00005, issued on February 18, 1991

Reason not incorporated:

October 25, 2001, IDEM was notified by Sonoco that the 14L laminator, identified as EU 203, was being dismantled and removed. Therefore, CP (41) 1883-00005 and requirements contained in it are not considered in effect.

(d) OP 41-12-92-0092, issued on December 22, 1988

Condition (condition 5)*:

"...capture efficiency of the fume capture system used in conjunction with the thermal incinerator shall be limited to a minimum of 75% pursuant to that rule."

Reason not incorporated:

Amendments to 326 IAC 8-5-5 have eliminated the requirement for EU 101 to maintain a 75% capture efficiency pursuant to that rule.

(e) OP 41-12-92-0092, issued on December 22, 1988

Condition (condition 6)*:

(1) That coating organic solvent concentration and gallons applied shall be limited to such that the total amount of organic solvent delivered to rotogravure printing press 6RL shall not exceed 19,309 pounds per day and 1570 tons per year.

(2) Additionally, operation of the parts washer is limited to 12 cycles per day and 350 days per year.

Reason not incorporated:

(1) SSM 081-12310-00005, issued on November 14, 2000 requires a more stringent limit on the total amount of organic solvent delivered to rotogravure printing press 6RL that shall not exceed 701.88 tons per year.

(2) The operational limit for the parts washer EU 102 has been changed to be expressed in terms of days per consecutive 12-month period, instead of days per year. This does not change the intent of the limit on this facility, but describes the limit in terms as it is currently applied. Expressing the operational limit in terms of an annual limit for a compliance determination period is more practical.

(f) OP 41-12-92-0092, issued on December 22, 1988

Condition (condition 9)*:

That an ambient ozone monitor shall be installed and operated at a location approved by the Commissioner. This monitor shall be operated from April 1 through October 31 for a minimum period of two complete seasons. After this period the owner may petition to have this monitoring requirement removed if it is established to the satisfaction of the Commissioner that ambient ozone levels will continue to comply with the national Ambient Air Quality Standards. Data from this monitor shall be submitted on a quarterly basis in a format approved by the Commissioner.

Reason not incorporated:

According to the Ambient Monitoring Section, the company collected two (2) full seasons of data in 1989 and 1990. Data for 1991 was collected for one-half of the season. No one-hour ozone exceedances were reported. Sonoco petitioned IDEM in April 1991 to request the removal of the ambient ozone monitoring requirement. Since no ozone exceedances were recorded, IDEM granted the petition. Thus, this condition is no longer applicable.

* This condition was incorporated into OP 41-12-92-0092 from a previous permit, CP (41) 1704-00005, issued September 22, 1988.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on November 15, 1996.

A notice of completeness letter was mailed to the source on November 25, 1996.

Emission Calculations

See Appendix A, pages 1 through 18, of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1.2
PM-10	1.4
SO_2	0.2
VOC	15,129.76
CO	15.4
NO_x	38.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Toluene	5201.10
Glycol Ethers	22.45
MDI	69.59
TOTAL	5293.14

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OAQ emission data and the 2000 Toxic Release Report.

Pollutant	Actual Emissions (tons/year)
PM	0
PM-10	0
SO_2	0
VOC	951
CO	2
NO_x	8
toluene	496
glycol ethers	5

County Attainment Status

The source is located in Johnson County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Johnson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The rotogravure presses are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.430 (Subpart QQ), because Subpart QQ is applicable only to publication rotogravure and does not address packaging rotogravure.

(b) This source is not subject to the New Source Performance Standard, 326 IAC 12, 40 CFR 60.740 (Subpart VVV), Standards of Performance for Polymeric Coating of Supporting Substrates Facilities. This rule applies to each coating operation and any onsite coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates. According to the rule, the definition of polymeric coating of supporting substrates is a "web coating process that applies elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil". Sonoco Flexible Packaging's coating operation (Tower 7, 5X, and 6X) coats paper, plastic film, and metallic foil, thus it does not perform polymeric coating of supporting substrates.

(c) The two (2) degreasing units are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T because the solvents used are not one of the solvents described in the applicability section. The solvent used in the degreasing units are n-methylpyrrolidone and ethylene glycol monobutyl ether.

(d) The five (5) solvent storage tanks are not subject to the New Source Performance Standard, 326 IAC 12, 40 CFR 60.110b (Subpart Kb), Standards of Performance for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction or Modification Commenced after July 23, 1984, because the design capacity for each storage tank is less than 40 m^3.

(e) The two (2) boilers are subject to the New Source Performance Standard, 326 IAC 12, 40 CFR 60.40c (Subpart Dc), because their heat input capacities are greater than ten (10) million British thermal units per hour (MMBtu/hr) but less than one hundred (100) million British thermal units per hour (MMBtu/hr), and they were each constructed after June 9, 1989. There are no applicable emission limitations or standards for natural gas boilers nor propane gas boilers. Record keeping of fuel usage is required.

(f) This source is subject to 326 IAC 20-18-1, 40 CFR 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry) because it is an existing facility that is a major source of HAP, at which product and packaging rotogravure printing presses are operated. Because the rotogravure printing presses, 6RL and 8RL, each apply no more than 400 kg of organic HAP per month, in accordance with 40 CFR 63.821(b), 6RL and 8RL are subject to the requirements of 40 CFR 63.829(e) and 63.830(b)(1):

(1) As specified under 40 CFR 63.829(e), the owner or operator shall maintain records of the total volume and organic HAP content of each material applied on product and packaging rotogravure printing presses during each month.

(2) Any change or modification which would increase the amount of organic HAP applied to the product and packaging rotogravure printing presses 6RL and 8RL to greater than 400 kg per month shall obtain prior approval from IDEM, OAQ and shall be subject to additional requirements of 40 CFR 63, Subpart KK.

(3) The owner or operator shall comply with the reporting requirements specified under 40 CFR 63.830(b)(1).

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

(g) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.

(1) This rule requires the source to:

(A) Submit a Part 1 MACT Application by May 15, 2002; and

(B) Submit a Part 2 MACT Application within twenty-four (24) months after the Permittee submitted a Part 1 MACT Application.

(2) The Permittee submitted a Part 1 MACT Application on May 15, 2002. Therefore, the Permittee is required to submit the Part 2 MACT Application on or before May 15, 2004. Note that on April 25, 2002, Earthjustice filed a lawsuit against U.S. EPA regarding the April 5, 2002 revisions to the rules implementing Section 112(j) of the Clean Air Act. In particular, Earthjustice is challenging U.S. EPA's 24-month period between the Part 1 and Part 2 MACT Application due dates. Therefore, the Part 2 MACT Application due date may be changed as a result of the suit. Based on a proposed settlement published in the August 26, 2002 *Federal Register*, it appears that U.S. EPA intends to revise the rule so that the due date of the Part 2 MACT Application will be within twelve (12) months after the Permittee submitted the Part 1 MACT Application.

(3) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of the following will occur:

(A) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or

(B) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or

(C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD Major Source Status)

Pursuant to 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration), this source is a major source because the potential emissions are greater than 250 tons per year. This source permitted in CP (41) 1704-00005 on September 22, 1988 was subject to PSD. No major modifications have been made at the source. This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

EU 101

Pursuant to CP (41) 1704-00005, issued on September 22, 1988, the VOC emissions from the 6RL rotogravure printing press EU 101 shall be controlled by a thermal incinerator with an overall control efficiency of 76%. Therefore, this constitutes the best available control technology (BACT) requirement in 326 IAC 2-2-3 (PSD rule: best available control technology (BACT)) which satisfies the requirements of 326 IAC 8-5-5.

Pursuant to SSM 081-12310-00005, issued on November 14, 2000, the total amount of organic solvent delivered to 6RL rotogravure printing press EU 101 shall not exceed 701.88 tons per consecutive 12-month period, with compliance determined at the end of each month. This limit restricts the VOC emissions increase from the 6RL rotogravure printing press EU 101 due to the proposed modification to less than 40 tons per year. Therefore, this modification is not considered a significant emissions increase and this source is not subject to additional requirements under 326 IAC 2-2.

EU 103/EU 105

Pursuant to CP 081-4414-00005, issued on August 28, 1995:

(a) As revised by this Title V permit, the VOC input to the 8RL rotogravure printing press EU 103 shall be limited to 1752 tons per consecutive 12-month period where compliance is determined at the end of each month.

(b) As revised by this Title V permit, the VOC input to the 8RL cold cleaning degreaser EU 105 shall be limited to 4.5 tons per consecutive 12-month period where compliance is determined at the end of each month.

(c) The thermal incinerator shall operate at all times the 8RL rotogravure printing press EU 103 is operated. When operating, the thermal incinerator shall maintain minimum operating temperature of 1,400°F or a temperature determined in the compliance tests to maintain at least 98% destruction of VOC captured. This condition satisfies the requirements of 326 IAC 8-5-5.

(d) The 8RL rotogravure printing press EU 103 shall be enclosed in a permanent total enclosure. (The 8RL rotogravure printing press EU 103 is enclosed in a permanent total enclosure which meets U.S. EPA requirements of ‘Procedure T’ and hence the enclosure is considered to have a capture efficiency of 100%.)

(e) All access doors and windows of the 8RL enclosure shall be closed during routine operation of the process.

These limits and conditions are necessary in order to limit the PTE to less than 40 tons per year. Therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, are not applicable.

EU 102
Pursuant to CP (41) 1704-00005, issued on September 22, 1988, the operation of the cold cleaner degreaser EU 102 is limited to 12 cycles per day and 350 days per consecutive 12-month period. These limits restrict VOC emissions from the above named facility such that they do not adversely affect the ozone ambient air quality standard over the Indianapolis Standard Metropolitan Statistical Area.

326 IAC 2-6 (Emission Reporting)
This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

Boilers, identified as Boiler EU 11 and Boiler EU 12

326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from Boiler EU 11, having a heating value of 20.925 MMBtu per hour heat input, shall be limited to 0.5 pounds per MMBtu heat input. 326 IAC 6-2-4 applies to Boiler EU 11 because it was constructed after September 21, 1983.

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from Boiler EU 12, having a heating value of 20.925 MMBtu per hour heat input, shall be limited to 0.41 pounds per MMBtu heat input. 326 IAC 6-2-4 applies to Boiler EU 12 because it was constructed after September 21, 1983.

These limitations are based on the following equation: $Pt = \frac{1.09}{Q^{0.26}}$

Pt = Pounds of particulate matter emitted per MMBtu heat input (lb/MMBtu).
Q = Total source maximum operating capacity rating in MMBtu/hr heat input. As each new indirect heating facility is added to a plant Q will increase. As a result, the emission limitation for each progressively newer facility will be more stringent until the total plant capacity reaches 10,000 MMBtu/hr.

When using natural gas, Boiler EU 11 and Boiler EU 12 are in compliance with 326 IAC 6-2-4 because each boiler has potential particulate matter emissions of 0.002 pounds per MMBtu heat input.

When using propane, Boiler EU 11 and Boiler EU 12 are in compliance with 326 IAC 6-2-4 because each boiler has potential particulate matter emissions of 0.007 pounds per MMBtu heat input.

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

Boilers EU 11 and EU 12 are not subject to 326 IAC 7-1, because each has a potential to emit that is less than twenty-five (25) tons per year and less than ten (10) tons per hour for sulfur dioxide.

Rotogravure Printing Presses, identified as EU 101 (6RL) and EU 103 (8RL)

326 IAC 6-3 (Process Operations)

Rotogravure printing presses 6RL (EU 101) and 8RL (EU 103) are not subject to 326 IAC 6-3, because they each have no particulate emissions.

326 IAC 8-5-5 (Volatile Organic Compound Emission Limitations for Graphic Arts Operations)

EU 101 (6RL)

6RL press EU 101 is subject to 326 IAC 8-5-5 because it is a packaging rotogravure press at a source existing as of November 1, 1980 with potential emissions of VOC greater than one hundred (100) tons per year. Pursuant to 326 IAC 8-5-5, the 6RL thermal incinerator shall maintain a 90% destruction efficiency.

EU 103 (8RL)

8RL rotogravure press EU 103 is subject to 326 IAC 8-5-5 because it is a packaging rotogravure press at a source existing as of November 1, 1980 with potential emissions of VOC greater than one hundred (100) tons per year. Pursuant to 326 IAC 8-5-5, the 8RL thermal incinerator shall maintain a 90% destruction efficiency. Additionally, 8RL is a new facility constructed after July 1, 1990, with potential emissions greater than 25 tons per year. Therefore, pursuant to 326 IAC 8-5-5, 8RL shall maintain an overall control efficiency of 65%.

Cold Cleaner Degreasers, identified as EU 102 (installed 1987) and EU 105 (installed 1995)

326 IAC 8-3-2 (Organic Solvent Degreasing Operations: Cold Cleaner Operation)

EU 102 and EU 105

326 IAC 8-3-2 applies to new facilities after January 1, 1980, performing organic solvent degreasing operations located anywhere in the state. Pursuant to 326 IAC 8-3-2, the owner or operator of each cold cleaning facility (EU 102 and EU 105) shall:

(1) equip the cleaner with a cover;

(2) equip the cleaner with a facility for draining cleaned parts;

(3) close the degreaser cover whenever parts are not being handled in the cleaner;

(4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) provide a permanent, conspicuous label summarizing the operating requirements;

(6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Organic Solvent Degreasing Operations: Cold Cleaner Degreaser Operation and Control)

EU 102

326 IAC 8-3-5 does not apply to EU 102 because EU 102 is located in Johnson County and was installed before July 1, 1990.

EU 105

326 IAC 8-3-5 applies to EU 105 because it was installed after July 1, 1990 and is located in Johnson County. Pursuant to 326 IAC 8-3-5(a), the owner or operator of a cold cleaner degreaser facility (EU 105) shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

(B) the solvent is agitated; or

(C) the solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Pursuant to 326 IAC 8-3-5(b), the owner or operator of a cold cleaning facility (EU 105) shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Extrusion Coater/Laminators, identified as EU 201 (5X) and EU 204 (6X)

326 IAC 6-3 (Process Operations)

The 5X and 6X extrusion coater/laminators (EU 201 and EU 204) are not subject to 326 IAC 6-3, because they each have no particulate emissions.

326 IAC 8-2-5 (Surface Coating Emission Limitations: Paper Coating Operations)

EU 201 (5X)

The coating booth, constructed in 1987, is not subject to 326 IAC 8-2-5 because the emissions have been limited to less than 25 tons per year by the registration issued on June 15, 1987. This permit incorporates this limit as an enforceable limit. Thus, the input of solvent to the coating booth shall be less than 25 tons per consecutive 12-month period, where compliance is determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per year. Compliance with this limit makes 326 IAC 8-2-5 not applicable.

EU 204 (6X)

The 6X extrusion coater/laminator EU 204 is subject to 326 IAC 8-2-5 because it is a web coating process of paper, plastic, and metal foil, installed after July 1, 1990, and it has actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to 326 IAC 8-2-5, Sonoco Flexible Packaging shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds (VOC) in excess of 2.9 pounds VOC per gallon of coating excluding water delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.

To achieve compliance with 326 IAC 8-2-5, pursuant to 326 IAC 8-1-2(2), coating stations 1 and 2 shall be controlled by the existing permitted 24.0 MMBtu/hr thermal oxidizer (CP 081-4414-00005, issued August 28, 1995), identified as 8RL, when coatings are applied which have a VOC content in excess of 2.9 pounds VOC per gallon of coating less water operating at a minimum temperature of 1,400°F, or a temperature and duct velocity determined in the compliance tests to maintain a minimum 98% destruction efficiency and a minimum capture efficiency of 82.6%.

Tower 7 Coating Booth, identified as EU 202

326 IAC 6-3 (Process Operations)

The tower 7 coating booth, EU 202 is not subject to 326 IAC 6-3, because it has no particulate emissions.

326 IAC 8-2-5 (Surface Coating Emission Limitations: Paper Coating Operations)

326 IAC 8-2-5 is not applicable to the Tower 7 coating booth EU 202 because the source is not located in Clark, Elkhart, Floyd, Lake, Marion, Porter, and St. Joseph Counties and the facilities were constructed prior to January 1, 1980. The coating booth EU 202 is located in Johnson County and was constructed in 1970.

Storage Tanks used for Solvent Storage

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The five (5) solvent storage tanks are not subject to 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) because this rule applies to solvent storage tanks located in Clark, Floyd, Lake, or Porter Counties.

Listed Insignificant Activities

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The insignificant activity welding is not subject to 326 IAC 6-3 because less than 625 pounds of rod or wire is used per day, and it is a trivial activity as defined in 326 IAC 2-7-1(40).

The trimmers are not subject to 326 IAC 6-3 because they do not produce fugitive emissions, are equipped with a trim material recovery device, and are trivial activities as defined in 326 IAC 2-7-1(40).

326 IAC 6-4 (Fugitive Dust Emissions)

Paved and unpaved roads and parking lots with public access are subject to 326 IAC 6-4 (Fugitive Dust Emission). This is covered under Section C.5 of the permit.

Testing Requirements

During the period within 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing utilizing Methods 24 and 25 (40 CFR 60, Appendix A) or other methods as approved by the Commissioner on the 6RL thermal oxidizer These tests shall be used to determine the overall control efficiency (capture efficiency and destruction efficiency) of the 6RL thermal incinerator. The 6RL thermal incinerator is required to have an overall control efficiency of 76%. By having an overall control efficiency of 76%, this will satisfy the PSD BACT (326 IAC 2-2-3). The operating temperature of the 6RL thermal incinerator shall be recorded during these tests and incorporated as a condition in the permit. These tests shall be performed according to 326 IAC 3-6 (Source Sampling Procedures). These tests shall be repeated at least once every 2.5 years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

During the period within 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing utilizing Methods 24 and 25 (40 CFR 60, Appendix A) or other methods as approved by the Commissioner on the thermal oxidizer controlling 8RL and 6X. These tests shall be used to determine the overall control efficiency (capture efficiency and destruction efficiency) of the 8RL thermal incinerator when used with the 8RL press, and when used with the 6X extrusion coater/laminator. The operating temperature of the 8RL thermal incinerator shall be recorded during these tests and incorporated as a condition in the permit. These tests shall be performed according to 326 IAC 3-6 (Source Sampling Procedures). These tests shall be repeated at least once every 2.5 years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for

enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The 6RL rotogravure printing press, identified as EU 101, has applicable compliance monitoring conditions as specified below:

   Pursuant to 326 IAC 8-1-12, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of each incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5 °C), whichever is more accurate.

   This monitoring condition is necessary in order to comply with the state rule 326 IAC 8-5-5 and Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21.

2. The 8RL rotogravure printing press, identified as EU 103, has applicable compliance monitoring conditions as specified below:

   Pursuant to 326 IAC 8-1-12, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of each incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5 °C), whichever is more accurate.

   This monitoring condition is necessary in order to comply with the state rule 326 IAC 8-5-5 and Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21.

3. The 6X extrusion coater/laminator, identified as EU 204, has applicable compliance monitoring conditions as specified below:

   The controller on the bypass damper in the vent line from the two coating station dryers to the thermal oxidizer will be connected to a strip chart record which will continuously record the positioning of the damper. The date and time will also be recorded on the strip chart. The strip chart recording compared with each job's schedule and coating calculations will confirm the use of the thermal oxidizer whenever non-compliant coatings are applied. The thermal oxidizer shall be operating at a minimum temperature of 1,400°F or a temperature and duct velocity determined in the compliance tests to maintain a minimum 98% destruction efficiency of captured volatile organic compounds (VOC).

   This monitoring condition is necessary in order to comply with the condition 326 IAC 8-2-5.

Conclusion

The operation of this commercial printing operation for coated and laminated materials shall be subject to the conditions of the attached proposed **Part 70 Permit No. T081-7183-00005**.

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Sonoco Flexible Packaging
Address City IN Zip: 6502 S. US Hwy 31, Edinburgh, IN 46124
CP: T081-7183-00005
Plt ID: 81-00005
Reviewer: Chrystal Wagner
Date: October 7, 2002

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
EU 103 (8RL rotogravure)	1000	51.5	324820.8

INK VOCS

Ink Name / Press Id	Maximum Coverage '(lbs/MMin^2)	Weight % Volatiles*	Flash Off %	Throughput (MMin^2/Year)	Emissions (TONS/YEAR)
R-106 release Lacquer (V-101884)	3	0.672	1	324820.8	327.419366
Nip-weld Cold Seal Adhesive (219-939)	8.2	0.433	1	324820.8	576.654366
Novacote Laminating Adhesive (NC-320)	4	0.25	1	324820.8	162.4104
Dynalock Extender (91379)	2	0.8357	1	324820.8	271.452743
Dynalock White Ink (5504)	3	0.6046	1	324820.8	294.579984

PTE VOC = 1632.52 Ton/yr

*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))